

CORRESPONDENCE/MEMORANDUM

Date: July 20, 1988

File Ref: 4400

To: Suzanne Bangert - HW-SW/3

RECEIVED

From: Nichol Mamolou - LMD

JUL 27 1988

Subject:

Hazardous Operation License - Small Storage Facility
Peterson Builders Inc. (PBI)
WID 096828975

WMD-OR-KRB

EPA, REGION V

RECEIVED
JUL 27 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

The purpose of this memo is to summarize completed license application requirements and to provide for the issuance of the final operating license for a small storage facility at PBI. Specifically:

1. All conditions of the EPA RCRA Part B permit have been satisfied. The EPA RCRA Part B permit was issued on August 6, 1984 with a 10 year duration. A plan modification was issued on Sept. 30, 1986. The DNR interim license was issued on April 27, 1983.
2. The small storage facility is exempt from feasibility and plan of operation requirements under 181.435(2) Wisconsin Adm. Code;
3. All fees have been paid. The Lake Michigan District Office received the necessary fee of \$700.00 from PBI. This was processed on April 5, 1988.
4. Linda Lynch reviewed a PBI financial responsibility submittal and found it to be complete. This is referenced in a March 15, 1988 to PBI as proof of financial responsibility for liability coverage.
5. A prelicensing inspection was conducted by Department Staff on July 12, 1988. Minor violations (class 2) were noted and resolved.

All necessary license requirements have been met by PBI. Please proceed with the issuance of a license for a small storage facility located at 107 E. Walnut Street, Sturgeon Bay, WI 54235-0605. Please have the license effective date listed as appropriate.

If you have any questions, please call Nichol Mamolou.

NAM:ms

cc: Ed Lynch - SW/3
Wayne Ringquist - SW/3
Chuck Slaustas - 5HS/13

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §270.41, §270.42, and §270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.
3. Permit Expiration. The duration of this permit shall be ten years from the effective date of the permit, in conformance with the provisions of 40 CFR §270.50. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR §270.13 - §270.29) and through no fault of the Permittee, the Regional Administrator has not issued a new permit as set forth in 40 CFR §124.51.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate methods from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 Second Edition, U.S. EPA, Standard Methods of Wastewater Analysis, EPA-600/4-79-020, U.S. EPA; or an equivalent method as specified in the attached Waste Analysis Plan.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of monitoring information shall specify:
 - (i) The dates, exact place, and time of sampling or measurements;
 - (ii) The individual(s) who performed the sampling or measurements;
 - (iii) The date(s) analyses were performed;

- (iv) The individual(s) who performed the analyses;
- (v) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.
11. Certification of Construction or Modification. The Permittee may not commence storage of hazardous waste at the facility until:
 - (a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - (b)
 - (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
 - (ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.
12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
- (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;
 - (iii) Date, time, and type of incident;
 - (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

- 16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition D.15.
- 17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. SIGNATORY REQUIREMENT

All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11.

F. CONFIDENTIAL INFORMATION

The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

G. DOCUMENTS TO BE SUBMITTED PRIOR TO OPERATION

This section does not apply.

H. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

- (1) Waste analysis plan as required by 40 CFR §264.13 and this permit.
- (2) Inspection schedules as required by 40 CFR §264.16(d) and this permit.
- (3) Contingency plan as required by 40 CFR §264.53(a) and this permit.
- (4) Closure plan as required by 40 CFR §264.112(a) and this permit.
- (5) Cost estimate for facility closure as required by 40 CFR §264.142(d) and this permit.
- (6) Operating record as required by 40 CFR §264.73 and this permit.
- (7) Personnel training documents and records as required by 40 CFR §264.15(b) and this permit.

II. GENERAL FACILITY CONDITIONS

- A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- B. Required Notice.
1. The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.
 2. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).
- C. General Waste Analysis.
1. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment I.
- D. Security. The Permittee shall comply with the security provisions of 40 CFR §264.14(b)(1) and (c).
- E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR §264.15(c). Records of inspections shall be kept as required by 40 CFR §264.15(d).
- F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).
- G. General Requirements for Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR §264.17(a) as they pertain to ignitable waste.
- H. Location Standards. This section does not apply.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV as required by 40 CFR §264.32.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR §264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by §40 CFR 264.35.
5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR §264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR §264.56 whenever there is constituent which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR §264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, in accordance with 40 CFR §264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator.

K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR §264.71, §264.72, and §264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), and (8).
2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR §264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR §264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.
4. Time Allowed For Closure. Within 90 days after receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities within 180 days after receiving the final volume of waste and in accordance with the schedule specified in the closure plan, Attachment V.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, Attachment V.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR §264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR §264.142(a), is specified in Attachment VI.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR §264.142(b).
2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR §264.142(c).
3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR §264.142(d).

O. Financial Assurance for Facility Closure.

1. The Permittee shall demonstrate continuous compliance with 40 CFR §264.143 by providing documentation of financial assurance, as required by 40 CFR §264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR §264.143.

2. Where the requirements of 40 CFR 264.143 are met through the use of State-required mechanisms pursuant to 264.149, documentation shall be made out to the Wisconsin Department of Natural Resources. Copies shall be submitted to U.S. EPA, Region V office.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR §264.147 and the documentation requirements of 40 CFR §264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

1. EPA Hazardous Waste No. F002 which includes the following spent halogenated solvents used in degreasing: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1 trichloroethane, chlorobenzene, 1,1,2 trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, and trichlorofluoromethane;
2. EPA Hazardous Waste No. F003 which includes the following spent non-halogenated solvents used in degreasing: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol;
3. EPA Hazardous Waste No. F005 which includes the following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, and pyridine.

B. Container Storage Capacity

The Permittee shall not exceed a maximum storage inventory of 50 55-gallon drums or 2750 gallons.

C. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

D. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172.

E. Management of Containers. The Permittee shall manage containers as required by 40 CFR §264.173.

F. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR §264.175 as specified in the attached plans and specifications, Attachment VII.

G. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable waste within 15 meters (50 feet) of the facility's property line.



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
SecretaryBOX 7921
MADISON, WISCONSIN 53707

April 15, 1988

#4190

Mr. William E. Muno, Chief
RCRA Enforcement Branch, SHS-12
U.S. EPA, Region V
230 S. Dearborn Street
Chicago, IL 60604

Dear Mr. Muno:

I'm concerned about EPA's decision not to prosecute a Part B permit violation we recently referred to you. You stated your decision was based on the fact that the permittee was not a High Priority Violator. That statement indicates to me that one of us does not understand Region V's definition of High Priority Violator.

It was WDNR's understanding that

(1) Facilities violating Part B Permit insurance liability requirements were considered by Region V to be High Priority Violators, and

(2) Those violations must be referred to EPA for prosecution.

Our understanding was based on statements you made at the FY 87 Year End Evaluation, which were repeated in EPA's written response to the evaluation. On page 2, paragraph 2, you say, "The Region views permitted facilities not in compliance with liability insurance as High Priority Violators (HPVs), and penalties will be assessed." Identical statements were made in your FY 88 First Quarter Evaluation.

As you may know, WDNR has on several occasions believed that certain HPV violations did not warrant a penalty, especially if the facility had returned to compliance. The case in which you undercut us was one for which we would not have recommended prosecution. We referred it to you only because you insisted. Your failure to follow your own policy has damaged our credibility with the company and your credibility with us. As a result, I am very reluctant to refer any more Part B permit violations to you.

I understand Region V will be in Madison later this month. I suggest you and I meet to discuss whether we can establish a true partnership of RCRA enforcement.

Sincerely,



Kathryn A. Curtner
Assistant Administrator
Division of Enforcement

KAC/jmd

cc: Basil G. Constantelos - U.S. EPA
Lyman Wible
Paul Dider
Barb Zellmer
Brenda Hagman



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-9047
101 Pennsylvania Street, P.O. Box

(414) 743-5574
TELEX 26-3423

3 March 1988

RECEIVED
MAR 09 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Mr. Rick Karl
US EPA - Region 5
230 South Dearborn
S HS 13
Chicago, IL 60604

RE: Peterson Builders, Inc.
RCRA Permit WID0096828975

Dear Mr. Karl:

Please modify our Part B Application with the enclosed page indicating that Gary Higgins is now the contact and person responsible for hazardous waste management activities at Peterson Builders.

Thank you.

Sincerely,

Gary Higgins
Environmental Coordinator

GH/ss
Encl (1)

waste shipment is manifested, it must be manifested to a permitted hazardous waste facility. Although Peterson could comply with the generation accumulation requirements for shipment off site, within ninety (90) days, for safety and security, PBI stores the waste in a secure warehouse. A permit is required to allow this safer method of operation.

The contact and party responsible for the hazardous waste management activities at Peterson Builders is:

Gary Higgins

Environmental Coordinator

414-743-5577

B-2 Facility Drawing

Drawing 1 is a sketch showing the general layout of the facility including the building, waste storage areas and other details. It should be noted that the area surrounding the PBI facility, for a greater distance than could be expected to be affected by a spill from such a minor storage area, was levelled in 1962 to create an industrial park. Within the industrial park, the land rises at the approximate rate of 1:2,000. Runoff would be a northeasterly direction.

B-3 Location Information

CONVERSATION RECORD

TIME

DATE

MARCH 5, 1986

TYPE

☐ VISIT☐ CONFERENCE☐ TELEPHONE☐ INCOMING☐ OUTGOING

ROUTING

NAME/SYMBOL

INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT
WITH YOU

TO FILE

ORGANIZATION (Office, dept., bureau,
etc.)

TELEPHONE NO:

SUBJECT

PERMIT MODIFICATION for PETERSON BUILDERS, INC.

SUMMARY

In a conversation with PBI's, John Beales, I told him we would begin a permit modification as outlined in a state addressed letter dated November 15, 1985, and that he would need to send a formal request to the EPA. I also indicated he would need to negotiate his own terms with the State regarding Feasibility and Plan of Operation call in dates.

ACTION REQUIRED

I will begin working on a permit modification.

NAME OF PERSON DOCUMENTING CONVERSATION

RICHARD RUPERT - MN/WI Unit

SIGNATURE

DATE

March 5, 1986

ACTION TAKEN

SIGNATURE

TITLE

DATE



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

February 26, 1988

IN REPLY REFER TO: 4190

Mr. E. L. Peterson, President
Peterson Builders, Inc.
P. O. Box 47
Sturgeon Bay, WI 54235-0047

Dear Mr. Peterson:

Peterson Builders, Inc., is being referred to the U.S. Environmental Protection Agency for apparent violations of the RCRA Part B Permit issued by U.S. EPA on August 6, 1984.

We are seeking enforcement action for the following alleged violations:

Failure to obtain proof of financial responsibility for closure, and

Failure to submit adequate demonstration of liability insurance coverage.

These violations were cited in a December 1, 1987 Notice of Violation, and are not covered by the January 11, 1988 Return-to-Compliance Letter.

Our action follows the provisions of the U.S. EPA-State of Wisconsin Hazardous Waste Grant Agreement. Any questions regarding this referral should be directed to Mr. David Pflug, District Environmental Enforcement Coordinator at (414) 497-6027.

Sincerely,

A handwritten signature in cursive script, reading "Kathryn A. Curtner".

Kathryn A. Curtner
Assistant Administrator
Division of Enforcement

KAC:BH:mm/85601I

cc: David Pflug - LMD
Bureau of Solid Waste Management - HW/3
U.S. EPA Region V - Chicago
Peter D. Flaherty - LC/5
Gary Higgins - Peterson Builders, Inc.

FEB - 1 1988

CORRESPONDENCE/MEMORANDUM

STATE OF WISCONSIN

Date: January 28, 1988

File Ref:

4190

To: John LaFontaine - EE/5

From: David A. Hildreth *DAH*

Subject: Recommendation to Refer Peterson Builders, Inc., to EPA for Violations of its Part B, RCRA Permit

The Lake Michigan District believes this proposed enforcement action is warranted. Please route the enclosed documents to the appropriate staff members for their review.

If you have any questions on this, please call David Pflug at 414-497-6027.

DEP:jm

cc: David Pflug
Donald Johnston

CORRESPONDENCE/MEMORANDUM

STATE OF WISCONSIN

Date: January 28, 1988

File Ref:

4190

To: C. D. Besadny

From: David A. Hildreth

DAH

Subject: Recommendations to Refer Peterson Builders, Inc., to U.S. EPA for Violations of its Part B, RCRA Permit

I. Executive Summary

Peterson Builders, Inc., has violated the proof of financial responsibility and the demonstration of liability insurance requirements contained in their EPA issued RCRA Part B permit. A Notice of Violation was issued for equivalent Wisconsin Administrative Code violations and a response is under review. During the recent EPA mid-year grant review, EPA requested referral of these violations to EPA for further enforcement.

II. General Information

Facility Name: Peterson Builders, Inc.

EPA ID: #WID096828975

Facility Address: 107 East Walnut Street
P.O. Box 47
Sturgeon Bay, WI 54235-0047

Responsible Official: Mr. E. L. Peterson, President

Company Contact: Mr. Gary Higgins, Environmental Coordinator

Department Contacts: Donald Johnston, Hazardous Waste Spec.
Suzanne Bangert, Environmental Engineer
David E. Pflug, Env. Enforcement Spec.

III. Description of Violations

Section NR 181.42(10)(g), Wis. Adm. Code, - Failure to update proof of financial responsibility for closure, and

Section NR 181.42(11)(d), Wis. Adm. Code, - Failure to submit adequate demonstration of liability insurance coverage.

These violations are also violations of the EPA Part B license issued on August 6, 1984.

IV. Chronology of Events

- 9/30/86 EPA issues a modification of the RCRA Part B permit originally issued to the company on 8/6/84.
- 7/16/87 State issues a request for an update on the proof mechanism for financial responsibility and an adequate demonstration of liability insurance.
- 11/4/87 District record review establishes violation discovery date.
- 12/1/87 Notice of Violation issued by the District for two Part B violations and a closure cost documentation violation. Notice requires a response within 15 days.
- 12/21/87 District receives company response dated 12/18/87.
- 1/11/88 District issues a return to compliance for the closure cost documentation violation.

Attached are copies of file document pertinent to this case.

VI. Recommendations

The two violations of a Part B permit cause Peterson Builders, Inc., to be considered high priority violators by EPA. At EPA's request therefore, the Lake Michigan District recommends referral of Peterson Builders, Inc., to EPA for further legal action.

cc: David Pflug
Donald Johnston



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5574
TELEX 26-3423

21 December 1987

RECEIVED DNR
DEC 28 1987
Lake Mich. Dist.

Ms. Nicole Mamolou
Dept. of Natural Resources
1125 N. Military Ave.
Green Bay, WI 54303

SUBJ: SUPPLEMENT TO PART "B"; FIBERGLASS DEPT. POSITION DESCRIPTIONS

Dear Ms. Mamolou:

The attached supplement to PBI's Part "B" should be added to that which is already in your position.

If you have any questions, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read "GH", followed by a horizontal line.

Gary Higgins
Environmental Coordinator

GH/ss
Enc (1)

NOTE: DO NOT USE THIS FORM WHEN DOCUMENTING INSPECTIONS AT HAZARDOUS WASTE AND SOLID WASTE FACILITIES.
SEE BACK SIDE OF THIS FORM FOR MORE INFORMATION.

ATTN: <u>file; Sue Bangert - SW/3</u>				License Number _____	
<input type="checkbox"/> Residuals Management SW/3		<input type="checkbox"/> District _____		EPA ID Number _____	
<input checked="" type="checkbox"/> Hazardous Waste Management SW/3 Unit _____		<input type="checkbox"/> Environmental Enforcement EE/5		WI- _____	
<input type="checkbox"/> Systems Management SW/3		<input type="checkbox"/> _____		Facility ID Number _____	
Facility/Company Name <u>Peterson Bldrs</u>		Location (Address or 1/4)		City, State, Zip Code <u>Surgeon Bay, Wi</u>	
Facility Type <u>T50</u>	District <u>LMD</u>	County <u>Door</u>	Contact Method <input checked="" type="checkbox"/> Telephone <input type="checkbox"/> In-Person	Date <u>11/23/87</u> M M D D Y Y	Time (24-Hour Clock) <u>0900</u>
Facility Representative Contacted <u>Gary Higgins</u>		Title or Position of Representative		Telephone Number (include area code) <u>(414) 743-5577</u>	

Gary called to discuss the permit exemption request from Don. I explained that if he has a permit on file, that getting another permit wouldn't be necessary. I told him that I wasn't very familiar w/ the facility to discuss the details.

I then asked him how things were going w/ the liability insurance. He said it was extremely difficult + expensive to obtain. The current insurance co, Alexander + Alexander, said that they would have to enter into a risk retention group ⇒ buying shares and paying a premium of \$100,000 (conservative est.). The other option is to convert of insurance policies to one firm and have a foreign (London) underwriter.

Finally, we discussed that it may be to their benefit to close and function as a LQG or possibly a SQG

Check if additional sheets attached ☐

By

G. Michel Mardon

NOTE: DO NOT USE THIS FORM WHEN DOCUMENTING INSPECTIONS AT HAZARDOUS WASTE AND SOLID WASTE FACILITIES.
SEE BACK SIDE OF THIS FORM FOR MORE INFORMATION.

ATTN: <u>file; Sue Bangert - SW/3</u>				License Number _____	
<input type="checkbox"/> Residuals Management SW/3		<input type="checkbox"/> District _____		EPA ID Number _____	
<input checked="" type="checkbox"/> Hazardous Waste Management SW/3 Unit _____		<input type="checkbox"/> Environmental Enforcement EE/5		WI- _____	
<input type="checkbox"/> Systems Management SW/3		<input type="checkbox"/> _____		Facility ID Number _____	
Facility/Company Name <u>Peterson Bldgs</u>		Location (Address or 1/4)		City, State, Zip Code <u>Surgeon Bay, WI</u>	
Facility Type <u>T30</u>	District <u>LMD</u>	County <u>Door</u>	Contact Method <input type="checkbox"/> Telephone <input type="checkbox"/> In-Person	Date <u>11/23/87</u> M M D D Y Y	Time (24-Hour Clock) <u>0900</u>
Facility Representative Contacted <u>Gary Higgins</u>		Title or Position of Representative		Telephone Number (include area code) <u>(414) 743-5577</u>	

Gary called to discuss the permit exemption request from Don. I explained that if he has a permit on file, that getting another permit wouldn't be necessary. I told him that I wasn't very familiar w/ the facility to discuss the details.

I then asked him how things were going w/ the liability insurance. He said it was extremely difficult + expensive to obtain. The current insurance co, Alexander + Alexander said that they would have to enter into a risk retention group ⇒ buying shares and paying a premium of \$100,000 (conservative est.). The other option is to convert of insurance policies to one firm and have a foreign (London) underwriter.

Finally, as we discussed that it may be to their benefit to close and function as a LQG or possibly a SQG.

Check if additional sheets attached ☐

By

C. Michael Mandon

NOTE: DO NOT USE THIS FORM WHEN DOCUMENTING INSPECTIONS AT HAZARDOUS WASTE AND SOLID WASTE FACILITIES.
SEE BACK SIDE OF THIS FORM FOR MORE INFORMATION.

ATTN: <u>file; Sue Bangert - SW/3</u>				License Number _____	
<input type="checkbox"/> Residuals Management SW/3		<input type="checkbox"/> District _____		EPA ID Number _____	
<input checked="" type="checkbox"/> Hazardous Waste Management SW/3 Unit _____		<input type="checkbox"/> Environmental Enforcement EE/5		WI- _____	
<input type="checkbox"/> Systems Management SW/3		<input type="checkbox"/> _____		Facility ID Number _____	
Facility/Company Name <u>Peterson Bldrs</u>		Location (Address or 1/4)		City, State, Zip Code <u>Surgeon Bay, WI</u>	
Facility Type <u>TSD</u>	District <u>LMD</u>	County <u>Dane</u>	Contact Method <input checked="" type="checkbox"/> Telephone <input type="checkbox"/> In-Person	Date <u>11/23/87</u> M M D D Y Y	Time (24-Hour Clock) <u>0900</u>
Facility Representative Contacted <u>Gary Higgins</u>		Title or Position of Representative		Telephone Number (include area code) <u>(414) 743-5577</u>	

Gary called to discuss the permit exemption request from Don. I explained that if he has a permit on file, that getting another permit wouldn't be necessary. I told him that I wasn't very familiar w/ the facility to discuss the details.

I then asked him how things were going w/ the liability insurance. He said it was extremely difficult + expensive to obtain. The current insurance co., Alexander + Alexander said that they would have to enter into a risk retention group \Rightarrow buying shares and paying a premium of \$100,000 (conservative est). The other option is to convert all insurance policies to one firm and have a foreign (London) underwriter.

Finally, he discussed that it may be to their benefit to close and purchase as a LQG or possibly a SQG.

Check if additional sheets attached ☐

By

C. Stetel-Murphy

DISTRICT

Don Johnston

LMD

FROM:

Linda Lynch

SW13

SUBJECT-MESSAGE

re: Peterson Builders, Inc. (WID096828975)

I have reviewed the files for Peterson Builders, Inc. in order to do a OKR record review. I have a bond on file for the above referenced facility for \$3192.70. This corresponds to a 1981 closure plan. I have no liability coverage on file for this facility.

In a 12/16/86 submittal by Peterson Builders, Inc. I found a certificate from Employers Insurance of Wausau for pollution liability coverage within the submittal, but it does not meet NR181 requirements.

REPLY

SIGNED

DATE

The wording needs to be as specified in NR181 and I need to have an original certificate on file. I also need an original bond on file for the adjusted closure cost estimate which is 15,016.26. If you have questions please call. Thanks.

rec'd 10/9/87.

cc Sue Bengert

SIGNED

DATE

FACILITY CHECKLIST

Facility Name: Peterson Builders, Inc. Reviewed by: Linda Lynch
 S. EPA ID #: WID096828975 Date: 09/01/87
 Facility address: 107 E. Walnut St., Sturgeon Bay 54235
 Owner Name: Peterson Builders, Inc.
 Owner address: 101 Pennsylvania St. Sturgeon Bay 54235
 Estimated closure cost: \$ 14,411.00 Date of estimate: 12/16/86
 Estimated post-closure cost: \$ - 0 - Date of estimate: 1 1
 Latest annual adjustment factor: 1.042
 Total estimated closure and post-closure costs: \$ 15,016.26 Last adjusted 9/11/87
15,016.26

Financial Assurance Mechanisms

Date Received: 12/16/87

Mechanism	Guarantor Name & Address	Effective Date	Amount of Coverage	Validation Date	Initials
perf. bond	United Fire + Casualty	11/24/81	\$ 3192.70	1 1	
		1 1		1 1	
		1 1		1 1	
		1 1		1 1	
		1 1		1 1	
		1 1		1 1	

Total Coverage \$ 3192.70

Liability Coverage Mechanisms

Date Received: 1 1

Mechanism	Guarantor Name	Effective Date	Amount of Coverage	Validation Date	Initials
	none	1 1	\$	1 1	
		1 1		1 1	
		1 1		1 1	
		1 1		1 1	
		1 1		1 1	
		1 1		1 1	

Total Coverage \$

FOLLOW-UP ACTIONS REQUIRED

DATE REQUIRED

Review cost estimates (90 days after anniversary date)

1 1

1 1

1 1

Comments: Closure cost estimate and performance bond must be brought up-to-date. I do not have a current bond for closure or for liability insurance.

Attachments:

SEP 30 1986

bHS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Beales
Peterson Builders Inc.
101 Pennsylvania Street
P.O. Box 47
Sturgeon Bay, Wisconsin 54235-0047

RE: Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
UID 096-828-975

Dear Sir/Madam:

On _____, the United States Environmental Protection Agency (U.S. EPA), Region V, modified the Resource Conservation and Recovery Act (RCRA) hazardous waste management permit for the above-referenced facility. The permit was issued initially on August 6, 1984.

This letter includes the Response to Comments, generated as a result of the public notice of the modified RCRA draft permit. This response was prepared under 40 CFR 124.17, which requires the U.S. EPA to issue a response to comments at the time that any final permit decision is issued by the Agency.

I have made the final decision to modify the RCRA hazardous waste management permit which was issued to the Peterson Builders Inc., Sturgeon Bay, Wisconsin. This final permit shall become effective on the date of this letter.

On behalf of U.S. EPA, I wish to thank you for your interest in the modified draft permit for Peterson Builders Inc., Sturgeon Bay, Wisconsin.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Richard O'Hara
Wisconsin Department of Natural Resources
bHS-13:R.Rupert:jt:9/16/86

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Angeles
Peterson Builders Inc.
101 Pennsylvania Street
P.O. Box 47
Sturgeon Bay, Wisconsin 54235-0047

At: Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
At: SHS-035-978

Dear Sir/Madam:

On _____, the United States Environmental Protection Agency (U.S. EPA), Region 9, modified the Resource Conservation and Recovery Act (RCRA) hazardous waste management permit for the above-referenced facility. The permit was issued initially on August 6, 1984.

This letter includes the response to comments, generated as a result of the public notice of the modified RCRA draft permit. This response was prepared under 40 CFR 124.13 which requires the U.S. EPA to issue a response to comments at the time that any final permit decision is issued by the Agency.

I have made the final decision to modify the RCRA hazardous waste management permit which was issued to the Peterson Builders Inc., Sturgeon Bay, Wisconsin. This final permit shall become effective on the date of this letter.

On behalf of U.S. EPA, I wish to thank you for your interest in the modified draft permit for Peterson Builders Inc., Sturgeon Bay, Wisconsin.

Sincerely,

Ralph S. Constantinos, Director
Waste Management Division

Enclosure

cc: Richard O'Hara
Wisconsin Department of Natural Resources

SHS-13:R.Rupert:jt:0

DATE	TIME	INITIALS	NAME	POSITION	REMARKS
9/17/86					
9/18/86					
9/24/86					
9/25/86					
9/29/86					

cc: 9/23/86
mm6
Loma
9/29/86

SEP 30 1986

Mr. John Beales
Peterson Builders Inc.
101 Pennsylvania Street
P.O. Box 47
Sturgeon Bay, Wisconsin 54235-0047

RE: Peterson Builders Inc.
Sturgeon Bay, Wisconsin
WID 096-824-975

Dear Mr. Beales:

We are pleased to inform you that Resource Conservation and Recovery Act (RCRA) major permit modification for Peterson Builders, Inc. is effective on the date of this letter.

The product of amending your present permit with the appropriately modified sections, that are enclosed, will yield your new RCRA permit.

Since the effective term of your permit is unaltered, it will still expire on August 6, 1994.

Your organization's cooperation during the permit modification process served our mutual benefit and was appreciated.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Richard O'Hara, WMD

5HS-13:R.Rupert:jt:9/29/86

SHS-13

Mr. John Reales
Peterson Builders Inc.
101 Pennsylvania Street
P.O. Box 47
Sturgeon Bay, Wisconsin 54225-0047

RE: Peterson Builders Inc.
Sturgeon Bay, Wisconsin
WID 098-928-975

Dear Mr. Reales:

Conservation
✓ We are pleased to inform you that Resource Conservation and Recovery Act (RCRA) permit modification for Peterson Builders, Inc. is effective on the date of this letter.

The product of amending your present permit with the appropriately modified sections, that are enclosed, will yield your new RCRA permit. Since the effective term of your permit is unaltered, it will still expire on August 6, 1994.

✓ Your organization's cooperation during the permit modification process served our mutual benefit and was appreciated.

Sincerely,

Rasil B. Constantelos, Director
Waste Management Division

SHS-13:R.Rupert:jt:9/17/86

TYP.	AUTH.	IL CHIEF	IN CHIEF	MI CHIEF	MM/WI CHIEF	SO CHIEF	FI CHIEF	NO CHIEF	FO CHIEF
J. Rupert 9/17/86	am 9/23/86				CBP 9/19		XLS 9/23/86	JOS 9/30/86	me for WMD 9/30/86

am 9/29/86
am 9/23/86
9/23/86

APR 8 1983

5HW-13

Mr. John Beales
Peterson Builders Incorporated
101 Pennsylvania Street
Sturgeon Bay, Wisconsin 54235

Re: EPA ID# WID 096828975

Dear Mr. Beales:

Pursuant to Section 3005 of the Resource Conservation and Recovery Act (RCRA), as amended and Code of Federal Regulations 40 CFR 122.4, 122.25 and 124.3, my staff has completed an initial review of your Part B application for a RCRA permit to store hazardous waste. The purpose of this initial review is to check for completeness of your permit application against a list of required information delineated on pp. 2889-2891, FR 46, January 12, 1981.

As a result of this review, we found that your application is incomplete because it is deficient in several areas. You will be notified that the application is complete after you have corrected these deficient areas described in an attachment to this letter. The due date for the submittal of such information is May 20, 1983. However, you are encouraged to submit to us this information at your earliest convenience. Please submit the information to us in quadruplicate.

In reviewing your application for completeness, we have found areas where clarifications or supplemental information are needed for our technical review. We have included these comments in our attachment, please note that the formal technical review will occur after we receive a completed Part B permit application.

Our Agency intends to work closely with the Wisconsin Department of Natural Resources (WDNR) in processing your Part B application. We will forward copies of all material we receive to the WDNR.

Please feel free to contact Mr. Richard Karl of my staff at (312) 886-6160, if you have any questions regarding this review.

Sincerely,

William H. Miner, Chief
Technical, Permits and Compliance Section

Attachment

095-8

cc: Robert Eckdale, WDNR
Jim Reyburn, WDNR
Lake Michigan District

INITIALS	DATE	TYPYST	AUTHOR	STU #1	STU #2	STU #3	TPS	WMB	WMD
5HW-13:RKARL	ap:6-81	50:4/7/83	WEM for RK	CHIEF	CHIEF	CHIEF WEM 4/7/83	CHIEF JBL 4/8/83	CHIEF	DIRECTOR

Attachment for Peterson Builders Incorporated (PBI)

1. Part A application

- A. The following areas of the Part A application are incomplete:

Form 1 VIIIB, XIIIB and C
Form 3 IX, X

- B. The storage design capacity specified on Form 3 IIIC differs from the design capacity specified in the Part B permit application.

- C. The EPA hazardous waste number specified on Form 3 IV 1 should be F005 instead of D001.

2. Facility Design

- A. The topographic map (item B-2) submitted does not include the surrounding land uses, a wind rose, and injection and withdrawal wells on-site and off-site. (40 CFR 122.25(a)(19)(iv), (v), and (ix)). This information need not be located all on one topographic map.

3. Waste Characteristics

- A. The rationale for the selection of parameters chosen for the waste analysis (Item C-2a) must be submitted (40 CFR 264.13(b)(1)).

- B. A description of the test methods used must be provided (Item C-2b). The test methods referred to as "included in SW-846" or as "other EPA-approved methods" must be specifically identified (40 CFR 264.13(b)(2)).

4. Procedures to Prevent Hazards

- A. The storage building's locked doors must be included on the inspection schedule and log as a security device. All fire control equipment to be used in the hazardous waste storage area must be included on the inspection schedule and log (Item F-2) (40 CFR 122.24(a)(5), 264.15).

- B. More specific information is needed concerning procedures to prevent hazards during loading/unloading operations (Item F-4a). (40 CFR 122.25(a)(8)(i)).

5. Contingency Plan

- A. The 50 drum design capacity specified on page G-2 differs from that specified in the Part A and closure plan. The design capacity provided must be consistent in all parts of the application.

- B. The capabilities of the emergency equipment must be discussed in the application. The location of emergency equipment must be indicated more specifically than "in the storage facility". Noting the location of such equipment clearly on a drawing of the storage area would be the most appropriate method (40 CFR 264.52(e)).
- C. The contingency plan includes descriptions of tank and pipeline leaks (p G-10, G-12). If hazardous waste tanks and any piping associated with it exist at this facility, then they would have to be addressed in other parts of the part B permit. If these do not exist then that portion should be deleted from the contingency plan.
- D. A description of what actions if any, the agencies listed on page G-17 have agreed to provide must be submitted (40 CFR 264.52(c), 264.37).

6. Closure Plans, Post Closure Plans and Financial Requirements

- A. An estimate of the maximum waste inventory (Page I-1) which agrees with the design capacity specified in the Part A must be specified in the closure plan (40 CFR 264.112(a)(2)).
- B. An estimate of the expected year of closure must be provided. (40 CFR 264.112(a)(4)).
- C. The closure cost estimate must be revised to reflect the cost of removing and treating or disposing of the maximum waste inventory. The assumption that outside facilities will remove, transport and recycle all waste free of charge or at a minimal cost to PBI is not an acceptable basis for estimating the cost of closure. Justification for all cost estimate must also be provided along with the date for all estimates (40 CFR 122.25(a)(15), 264.142).
- D. Proof of financial responsibility for closure, based on the increased cost estimate as required in C above, must be submitted. If the state-requested financial mechanism is being used in lieu of a mechanism contained in 40 CFR 264.143, a letter requesting that the state mechanism be acceptable must be submitted. (40 CFR 122.25(a)(18), 264.149).
- E. Proof of liability coverage for sudden accidental occurrences must be submitted (40 CFR 122.25(a)(17), 264.147).



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5574
TELEX 26-3423

RECEIVED ⁴ March 1986

MAR 07 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

U. S. E. P. A. Region V
230 South Dearborn
5HS13
Chicago, IL 60604

Attn: Mr. Richard Rupert

Subj: Peterson Builders, Inc.
Permit Amendment Application of 15 November 1985
RCRA Permit WID 096828975

Dear Mr. Rupert:

As noted in our conversations of 28 February and 3 March, PBI requests earliest possible review and approval of subject application because of State deadlines.

The revised application includes the following:

1. Storage permitted is raised from 50 to 100 bbl. This is to permit full semi-load disposal. Facility design capacity is approximately 600 bbl. Closure bond has been increased accordingly. The bond was in effect on 15 November 1985.
2. PBI now reduces wastes and hazards by generator on-site reclamation. This produces solid residues instead of liquid solvents. These new waste streams are reflected.
3. PBI produces about two barrels of used Di-OctylPhthalate annually. This new waste is reflected.
4. Administration of the program (primarily record keeping) is to be moved from PBI's Industrial Engineering Department to the Warehousing/Transportation Department. This is being done to provide tighter internal control and accountability in the movement of hazardous wastes. The training plan reflects this change.

095-42

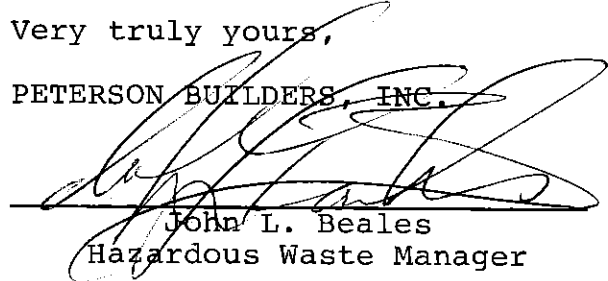
(2)

5. Inspection forms have incorporated comments of EPA and DNR on-site inspectors. Emergency telephone numbers have been made current. My name has replaced that of the Industrial Engineer as the overall program coordinator.

Thank you for the cooperation you have shown to date and your continuing efforts to aid our hazardous waste safety program.

Very truly yours,

PETERSON BUILDERS, INC.

A large, stylized handwritten signature in black ink, appearing to read 'John L. Beales', is written over the printed name and title.

John L. Beales
Hazardous Waste Manager

JLB:slv

cc: Don Johnston-WDNR



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

Re: Peterson Builders, Inc.
Sturgeon Bay, Wisconsin
WID096828975

Dear Sir/Madam:


On **AUG 06 1984**, the United States Environmental Protection Agency (U.S. EPA), Region V issued a Resource Conservation and Recovery Act (RCRA) hazardous waste management facility permit to the above facility.

This letter includes the Response to Comments, generated as a result of the public notice for the draft permit (Enclosure (1)). This response was prepared under 40 CFR 124.17(a) which requires the U.S. EPA to issue a response to comments at the time that any final permit decision is issued by the U.S. EPA, pursuant to 40 CFR 124.15.

I have made the final decision to issue a RCRA hazardous waste management facility permit to Peterson Builders, Inc. for its facility in Sturgeon Bay, Wisconsin. Unless review is requested under 40 CFR 124.19, this final permit shall become effective 30 days after issuance (Enclosure (2)).

On behalf of U.S. EPA, I want to thank you for commenting on the draft permit for Peterson Builders.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Richard O'Hara
Wisconsin Department of Natural Resources

095-36

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary Higgins
 Manager, Industrial Engineering
 Peterson Builders, Inc.
 101 Pennsylvania Street
 Sturgeon Bay, Wisconsin 54235

Re: Peterson Builders, Inc.
 107 E. Walnut Street
 Sturgeon Bay, Wisconsin
 WID096828975

AUG 06 1984

Dear Mr. Higgins:

Enclosed is a copy of the final Resource Conservation and Recovery Act (RCRA) permit for your facility in Sturgeon Bay, Wisconsin. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

The duration of this permit is ten (10) years. However, the United States Environmental Protection Agency may modify, revoke, reissue or terminate this permit based on causes specified in 40 Code of Federal Regulations (CFR) Section 270.40 and 270.41.

The permit as issued is effective as of the date indicated on the cover page of the permit. You have the right to appeal any condition of the permit pursuant to 40 CFR 124.19.

Sincerely,

Basil G. Constantelos, Director
 Waste Management Division

Enclosure

cc: Richard O'Hara
 Wisconsin Department of Natural Resources

5HW-13:RKARL:ap:6-6143:5/30/84:B

0 25-35

INITIALS	DATE	TYPYST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WM DIR.
ap	5-30-84		R. Karl			WFM 6/5/84	WMB 6/6/84	KIK 6/1/84	WMB 6/1/84

FEB 29 1984

Public Notification for Peterson Builders, Inc. of
Sturgeon Bay, Wisconsin

Karl J. Klepitsch Jr., Chief
Waste Management Branch

Chris Christenson, Chief
State Programs Information Section

I request the following actions to be taken by the Regulatory Analysis and Information Unit concerning the draft Statement of Basis and Permit Conditions for Peterson Builders, Inc. of Sturgeon Bay, Wisconsin for an RCRA Permit to store hazardous wastes in containers.

1. Initiate a 45-day Public Notice period requesting comments on the merits of the application. This Notice should be sent to a general circulation newspaper that would be available to citizens of Sturgeon Bay, Wisconsin.
2. Send original copies of the Public Notice and the proposed approval conditions and Statement of Basis, to all Federal and State-elected officials in Wisconsin prior to release of the Public Notice. Region V mailing lists are suitable for this purpose.
3. Provide a news release, to media services to be disseminated to major newspaper and electronic media in conjunction with release of the Public Notice.
4. Establish appropriate reference files at the U.S. EPA Region V Library. Reference materials should be available at the Library prior to advertisement of the Public Notice.

If you need further information or assistance with these public notification actions, please contact Mr. Richard Karl of my staff at 886-6143.

Attachment

5HW-13:RKARL:SSMITH:1/20/84

095-16

	INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
			AP	R. Karl			WEM	for	WEM	
			1-20-84	2/24/84			2/1/84	3/1/84	2/1/84	



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

2 AUG 1984

MEMORANDUM

SUBJECT: FINAL RCRA PERMIT REVIEW FOR PETERSON BUILDERS, INC.

FROM: Richard Mednick *Richard Mednick*
Assistant Regional Counsel

TO: Mary Gade, Chief
Solid Waste and Emergency Response Branch

I have completed review of the Final Permit, Responsiveness Summary and Administrative Record for Peterson Builders, Inc. In my assessment, U.S. EPA has complied with the substantive and procedural requirements of 40 CFR Part 124. U.S. EPA provided proper public notice of intent to issue a permit, and since no public comments were recieved in response to the notice, U.S. EPA did not arrange for a public hearing. No changes have been made to the draft permit, and no additional documents have been added to the Administrative Record.

In summary, the permit and accompanying documents, and the procedures followed by U.S. EPA during the permitting process are legally sufficient to allow a RCRA permit to be issued to Peterson Builders, Inc.

095-40



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

In reply refer to:
N00024-81-C-2022
9550 - 1475 - JLB
24 February 1984

Mr. Richard Karl
USEPA Region V
P. O. Box A 3587
Chicago, IL 60690-3587

Re: RCRA Permit WID 096828975 G, TSD, PA

Dear Mr. Karl:

I am enclosing four (4) copies of the changes page, certification and waste analysis for PBI's West Side fiberglass facility. Please make the appropriate changes to the storage facility (WID 096828975) permit application. These changes should bring both the storage and fiberglass facilities into compliance with the regulations.

Thank you for your assistance and cooperation in helping PBI through this matter.

PETERSON BUILDERS, INC.


John L. Beales

JLB:lmh

Encl: Four (4) copies of Rev. 3

cc: Mr. D. Johnston, WDNR w/o encl.
G. Higgins w/encl.
J. Peterson w/o encl.

RECEIVED

MAR 1 1984

WASTE MANAGEMENT BRANCH
EPA, REGION V

COPY

received
3-1-84

095-15

RCRA PERMITS PROGRAM BRIEFING

Office of Solid Waste

January 12, 1984

MAJOR REQUIREMENTS ADDED BY PART 264

(COMPARED TO INTERIM STATUS STANDARDS)

In a number of places, the Part 264 facility standards add significant requirements above and beyond those required under the Part 265 interim status standards. Major examples include:

I. Storage Standards

- Secondary containment systems for container facilities.
- Design standards for tanks (e.g., minimum shell thickness).

II. Incinerator Standards

- Performance standards (99.99% destruction and removal efficiency; controls on emissions of hydrogen chloride and particulate matter).
- Operating requirements (limitations on waste feed, temperature, combustion gas velocity, carbon monoxide levels).
- Automatic waste feed cut-off when operating conditions are violated.
- Installation and continuous monitoring of various monitoring instruments.

III. Disposal Standards

(Note: some of the following requirements may not be applicable to certain disposal facilities; e.g., "existing portions"; enclosed waste piles.)

- Liners.
- Leachate collection systems.
- More frequent and comprehensive inspections.
- Design standards and certification for dikes.
- Removal of leaking impoundments from service.
- For land treatment, detailed treatment program, demonstrations, and design standards.

*unit of wastes
degradation*

IV. Groundwater Protection Standards

- Opportunity of monitoring for many more parameters.
- Opportunity for larger number of wells.
- Opportunity for "corrective action" to remove or treat hazardous constituents.
- No self-granted waivers.

FA destruction

RESPONSE TO INTERIM STATUS GROUNDWATER DATA:

USE OF ENFORCEMENT AND PERMIT PROCESSES

Background:

- Existing facilities are required to conduct groundwater monitoring (GWM) under Interim Status Standards (ISS). Facilities should have results from at least 1 year of monitoring by now.
- A summary of interim status GWM data must be submitted with the Part B application, to help EPA establish permit conditions.
- However, many facilities have not fully complied with interim status GWM requirements. Data is often missing or inadequate.
- In other cases, interim status reports or inspections may indicate presence of contamination.

Issue: How should Regions respond to inadequate GWM data or evidence of contamination?

Regions have several options in these situations:

- Use enforcement actions to achieve full compliance with ISS requirements.

Advantages:

- Indicates EPA is serious regarding compliance with RCRA.
- Satisfies public interest in such compliance.
- Establishes ISS background data prior to permit decisions.

Disadvantages:

- Requiring full compliance could delay permit process for over a year and thus delay enhanced environmental protection added by Part 264.
- Interim status GWM requirements are generally less stringent and comprehensive than permit requirements. Thus, data and protection gained through enforcement may be less desirable than that gained through permitting.

- 10
° Use Part B requirements to secure GWM data needed for permitting.

Advantages:

- Part B requirements generally lead to better monitoring systems and data than the ISS requirements.
- Emphasis on Part B preparation moves facility more quickly toward permit and superior part 264 requirements.

- *Characterization of permit*

Disadvantages:

- Lack of full compliance with ISS may weaken enforcement posture.
- Could lead to negative public reactions.

- ° Move to permit issuance despite gaps in GWM data.

Advantages:

- Expedited permit issuance brings quickest application of Part 264.
- Additional GWM data (based on Part 264 requirements) can be obtained through detection monitoring program and compliance schedule in permit.
- Expedited permit issuance may lead to quickest corrective action.

Disadvantages:

- Questionable legality (e.g., is the Part B "complete"?).
- Could undermine enforcement posture.
- Lack of full ISS or Part B GWM data will reduce ability to write appropriate permit conditions up front.
- Public is likely to perceive this as "rewarding bad actors" (including potential sources of contamination).

Suggested Approach:

° Combine options as appropriate to various fact situations.

° Keep in mind three goals:

- ° Take enforcement actions for violations of ISS requirements (although remedies may vary, as in situations described below).
- ° Obtain best possible GWM data as quickly as possible.
- ° Move facilities which can comply with Part 264 to a permit as quickly as possible.

° The following three examples demonstrate how this approach might work.

Scenario One

Situation: Facility is complying with ISS requirements. Part B is called. *Contamination is discovered (either through ISS assessment or inspection).

Response:

- Tell facility in call-in letter (or after permit-related inspection) to submit in the Part B GWM data needed for Part 264 "compliance monitoring" program. This includes monitoring for Appendix VIII constituents.
- If such data is not submitted in Part B, immediately issue a compliance order and fine for "incomplete" Part B. (In most cases at present, Region would send a warning letter allowing additional time.)

Scenario Two

Situation: Facility has taken some steps to comply with ISS requirements, but does not have complete or adequate GWM data. Part B is called.

* If 5/8/81 GWM data
not held at
order 5/13/81

Response:

- Take enforcement action for any failure to comply with ISS. Tie enforcement compliance schedule for additional GWM data to Part 264 requirements and Part B due date (as much as possible).
- Reduce length of ISS monitoring period to expedite data gathering. (For example, this could mean monthly sampling for only 4 months.)
- If adequate GWM data is not submitted in Part B, issue compliance order and fine for "incomplete" application and/or for violation of ISS compliance order.

Scenario Three

Situation: Facility has no usable GWM data, due to lack of wells or other major non-compliance with ISS. Part B is called.

Response:

- Take enforcement action (including fine) for failure to comply with ISS.

Assume facility may be contaminating ground water and therefore treat it as if it is under ISS assessment program. Require monitoring for Appendix VII constituents, and additional wells (if needed).

- Require submission of above data with Part B (if possible).

- Reduce length of ISS monitoring period to expedite data gathering. (For example, this could mean monthly sampling for only 4 months.)

- If adequate summary of ISS data is not submitted in Part B, issue compliance order and fine for "incomplete" application and/or for violation of ISS compliance order.

Will increase call-ins
all ld disp call-ins by end
of '85

2008 and 2009
12/1/01
12/1/01

Under
broad
scope
of
the
rule
the
fine
is
called
for
the
failure
to
submit
the
data
and
the
fine
is
called
for
the
violation
of
the
ISS
compliance
order.

SCHEDULES OF COMPLIANCE

- o Discretionary--RA/Director may require compliance on permit effective date
- o Permit conditions subject to a compliance schedule must be specific
 - To assure permit conditions are enforceable
 - To assure adequate opportunity for review by the public
- o Full compliance, or interim milestones, must be met within 1 year; compliance date for all other permit conditions is the permit effective date
- o Appropriate use:
 - Existing facilities facing major investment and construction requirements as a result of §264 permit requirements
- o Inappropriate use:
 - To gather information needed to develop permit conditions--use NOD
 - To correct existing interim status violations
 - Misc. (ie - location of sprinkling system)

2000 Contaminant

Public Participation Process for RCRA Permits

° Key elements of the current process:

- RCRA requires extensive public participation procedures.
- Public is involved following preparation of draft permit.
- Public notice of draft permit is provided:
 - Newspaper notices and radio ads;
 - Mailings to people on permit notice lists;
 - State and local governments notified;
 - Availability of Part B, draft permit described in notices.
- EPA prepares "fact sheet" or "statement of basis" describing draft permit.
- Public is given 45 days to comment.
- Public is given opportunity for a hearing. Hearing must be held if requested and if written notice of opposition to permit is received.
- Following hearing and comment period, EPA must respond in writing to public comments. EPA may change permit and reopen comment period in response to comments.
- Involvement in this process is generally a prerequisite for appealing a final permit.

° Results to date:

- Public participation adds 2-3 months to all permits, more time for controversial facilities.
- Public participation also involves costs for notices, ads, hearings, and staff time for additional paperwork.
- Extent of public involvement varies widely among permits, Regions.
- Public generally raises non-RCRA issues (e.g., siting, EIS, truck traffic).
- Joint EPA-state hearings often held; helps to reduce duplicative procedures.

RCRA PERMIT APPEALS

- o Procedures are spelled out in §124.19.
- o Petitions are handled by Administrator's Office.
- o The Administrator must be kept insulated from specific permit actions so that he can be impartial if a permit is appealed.
- o OGC suggests some OSWER technical and managerial staff also remain uninvolved in specific permit actions in order to provide impartial advice to the Administrator.
- o Petitioners can request a review of part or all of the permit. All unchallenged conditions remain in effect. The petition must be filed within 30 days of service of notice of the final permit decision.
- o ORC and permittee are allowed by the Judicial Officer to respond to the petition.
- o If the Judicial Officer denies the petition, the permit conditions become final.
- o If the petition is granted, the Administrator gives public notice and requests briefs on those parts of the permit that are being formally reviewed.
- o If the appeal is granted, the permit will be remanded to the RA for further action. *Original resources refiled - technical*
- o An administrative appeal is a requirement for further judicial review.
- o OSW estimates approximately 50 appeals of RCRA permits in FY84 and 50 appeals in FY85 *4 ORC*

RCRA PERMIT APPEALS TO DATE

<u>Facility</u>	<u>Location</u>	<u>Type</u>	<u>Complaint</u>	<u>Resolution</u>
RTI	Region 3	storage	No EIS	Rejected
IT	Region 6	land disposal, incinerator, storage	No EIS	Rejected
Sharon Steel	Region 3	landfill	EPA failed to permit under 267 stds.	Region and petitioner reaching settlement
WTI	Region 5	incinerator storage	Region failed to send permit application to West Virginia; technical conditions	Decision pending
BFC	Region 5	incinerator storage	Technical conditions	Decision pending
Velsicol	Region 4	storage	Permittee is challenging use of attachments as permit conditions	Decision pending

MODIFICATIONS TO RCRA PERMITS

- o For major modifications, the procedures are identical to issuing a permit
 - Draft permit
 - Public notice
 - Opportunity for hearing
- o Only conditions subject to modification are reopened
- o Major modification may be made only for "cause"
 - Material and substantial changes or additions to the facility, or operations
 - Information not available at permit issuance
 - New regulations or remanded rules, at request of permittee
 - Modification of compliance schedule, for good cause
 - Termination of the permit
 - Transfer of the permit
 - Other
- o Minor modifications require no public notice or draft permit
 - Limited to specific list in regulations
- o Proposed amendments expand Director's discretion to make minor modifications
- o No permit modification allowed for other permit conditions
- o Other areas where amendment to major and minor modification rules are desirable
 - Allow individual permits to list areas for minor modification beyond those identified in the regulations
 - Allow other modifications, if processing tied to a major modification
 - Allow modifications to remove unnecessary level of detail in permits
- o Resource implications

PERMIT PROCESSING WORKLOAD

- The permitting workload is divided between the States and the Regions. There is considerable variation by Region, within Region, and by State.
- Four basic models describe how this work is divided:

State Lead: State processes application and drafts permit, EPA provides oversight (e.g., Region V)

Joint Review: State and Region work together on reviewing applications and drafting permits (e.g., Region IV)

Independent: Duplicative review of applications and drafting of permits by States and Regions (e.g., Region III)

EPA Lead: EPA processes application and drafts permit with States assigned specific responsibilities in some instances (e.g., Region IX)

- Each model can be described in terms of the amount of EPA resources needed, the time it takes to process an application, and the degree to which it builds State capability.
- It is too early to determine whether a correlation exists between the model employed and the number of permits issued.



Peterson Builders, Inc.

SHIP DESIGNERS
AND BUILDERS

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

9 September 1983
RECEIVED

SEP 12 1983

Mr. Richard Karl
USEPA Region V
P O Box A 3587
Chicago IL 60690-3587

WASTE MANAGEMENT BRANCH
EPA, REGION V

Re: RCRA Permits WID 096828975

Dear Mr. Karl:

Peterson Builders, Inc., by Navy contract, will be required to perform some fiberglass construction. Clean up of fiberglassing tools requires the use of solvents which are listed as hazardous wastes. Those solvents, may from time to time include Acetone, Methyl Ethyl Ketone (MEK) and/or Methylene Chloride.

PBI's present plans call for fiberglass construction; at Plant II located at Walnut and Lansing, two blocks west of the storage warehouse, beginning in late September 1983; and at the Main Shipyard on Pennsylvania Street, sometime in mid 1984.

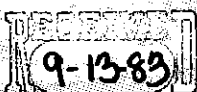
The particular solvent used will vary with the type of construction being performed. It is not anticipated, however, that all of the above solvents will be used at any one time at either location. The specific solvent in use however, will vary from time to time.

With this in mind I have revised PBI's Parts A and B applications to allow storage of all three solvents. I have included Tables (2), (3) and (4) for waste analysis. All tables are marked "Not Presently In Use". As PBI begins to generate individual wastes, a complete analysis will be conducted and a revision page forwarded.

One additional factor has affected revision of the application. Sheboygan Paint will no longer be the sole supplier/receiver of PBI wastes. Various vendors are being solicited to supply solvents. If selected, each of these vendors has agreed to provide removal and recycling services.

Enclosure (1), page amendments to the PBI RCRA permit application are forwarded for your review and approval.

continued...



095-14

Mr. Richard Karl
USEPA Region V

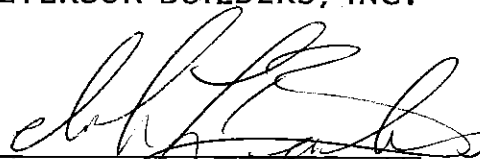
-2-

9 September 1983

The Generator plans required by DNR will be forwarded under separate cover. PBI will prepare an individual generator plan for the Fiberglass Department rather than combining the Paint Department and Fiberglass Department plans.

Very truly yours,

PETERSON BUILDERS, INC.


John L. Beales

dj

Enclosure: Revision (2), 4 copies

received
9-13-83

COPY,



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

27 May 1983

Mr. Richard Karl
RCRA Activities
USEPA Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

RE: EPA I.D. No. WID 096828975

Dear Mr. Karl:

Due to the extensive changes necessitated by the comments of various agencies, PBI's Part B Application has been completely revised.

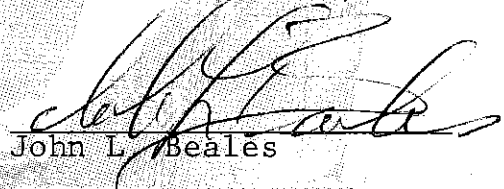
Please find enclosed three (3) copies of the revised Part B Application. I believe this revised edition addresses all outstanding comments and deficiencies.

Four (4) copies have already been sent to the Wisconsin Department of Natural Resources.

Thank you for your cooperation in this effort.

Sincerely yours,

PETERSON BUILDERS, INC.


John L. Beales

JLB/nc

Enclosures

RECEIVED
JUN 07 1983

WASTE MANAGEMENT
BRANCH

received
6-7-83

COPY 2

JUN 10 1983

SN-13

Mr. William Rock
Wisconsin Department of Natural Resources
Post Office Box 8084
Madison, Wisconsin 53708

RE: Hazardous Waste Part B Permit Application

Facility EPA ID#: WIS056820475
Facility Name: Petersen Builders Inc.
Facility Address: Okauchee Bay, Wisconsin

Dear Mr. Rock:

Enclosed is a response to the April 8, 1983, Notice of Deficiency sent to the above facility. Your agency is requested to review the response and provide any comments by July 5, 1983, to Mr. Richard Earl of my staff. If the application is deemed complete please begin the technical review and prepare a draft permit or permit denial as well as a draft public notice and a statement of basis. Please submit this information to us by September 10, 1983.

Please contact Mr. Earl at (312) 323-6160, if you have any questions.

Sincerely yours,

William R. Winer, Chief
Technical, Permits and Compliance Section

Enclosure

095-13

cc: Jim Eychorn
Lake Michigan District Office
Wisconsin Department of Natural Resources

bcc: Diane Bartelt (SS)

SN-13: Earl	TYPIST	AUTHOR	STU #1	STU #2	STU #3	TPS	WMB	WMP
INITIALS	DATE	DATE	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	Dir.
	6/9/83	6/10/83			WEY	WMB		
					6/10/83	6/10/83		

EPA Form 1300-4 (7-72) REPLACES EPA HQ FORM 8300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

BOX 7921
MADISON, WISCONSIN 53707

March 15, 1983

IN REPLY REFER TO: 4430

Mr. Richard Karl
U.S. EPA, Region V
Technical, Permits & Compliance Section
230 S. Dearborn St.
Chicago, IL 60604

Re: Hazardous Waste Facility Part B Application
Facility EPA ID No.: WID 096828975
Name: Peterson Builders, Inc.
Address: 107 E. Walnut
Sturgeon Bay, WI 54235

RECEIVED
MAR 18 1983
WASTE MANAGEMENT
BRANCH

Dear Rick:

The hazardous waste Part B application and correspondence, for the above referenced facility, received on February 11, 1983, has been reviewed for completeness by the Bureau of Solid Waste Management. Based on this review, the Department has determined the Part B application does not contain the information required by RCRA. Therefore, the application is not complete and the following information must be submitted in order to complete the processing of the Part B application:

A. Part A Application

The following areas of the Part A application are incomplete:

Form 1 VIIIIB, XIIIB and C
Form 3 VI, IX, and X

waste should be Form 5

The storage design capacity specified on Form 3 IIIC differs from the design capacity specified in the Part B application. A complete and accurate Part A application must be submitted.

C. Waste Characteristics

C-2a. A rationale for the selection of parameters chosen for the waste analysis must be submitted.

C-2b. All test methods referred to as "included in SW-846" or as "other EPA approved methods" must be specifically identified.

F. Procedures to Prevent Hazards

F-2a. The storage building's locked doors must be included on the inspection schedule and log as a security device.

095-4

F-4a. A secondary containment system for the unloading area must be discussed. Areas to be addressed include prevention of runoff from hazardous waste handling areas and the prevention of contamination of water supplies.

G. Contingency Plan

G-1. The 50 drum design capacity specified on page G-2 differs from that specified in the Part A and closure plan. An accurate estimate of the design capacity must be provided and be consistent in all parts of the application.

G-5. The capabilities of the emergency equipment must be discussed in the application. The location of emergency equipment must be indicated more specifically than "in the storage facility." Noting the location of such equipment clearly on a drawing of the storage area would be the most appropriate method. ✓

G-6. A description of what actions the agencies listed on page G-17 have agreed to provide must be submitted.

I. Closure Plans, Post-Closure Plans and Financial Requirements

I-1c. An estimate of the maximum waste inventory, which agrees with the design capacity specified in the Part A and is consistent throughout the application, must be specified in the closure plan.

I-1d. A discussion of what procedures will be used to remove waste inventory in the event the waste can no longer be recycled must be included in the closure plan.

I-1e. An estimate of the expected year of closure must be provided.

I-4. The closure cost estimate must be revised to reflect the cost of removing and treating or disposing of the maximum waste inventory. The assumption that outside firms will remove and recycle all waste free of charge or at minimal cost to Peterson Builders, Inc. is not an acceptable basis for estimating the cost of closure. The cost of closure cannot be reduced by the existing or potential value of a waste. Again, please be reminded that the maximum waste inventory in the closure plan must agree with the design capacity specified in the Part A application. Justification for all cost estimates must also be provided along with the date for all estimates. IF recycled

I-5. Proof of financial responsibility for closure, based on the increased cost estimate as required above, must be submitted. If a state-required financial mechanism is to be used, it must also be based on the increased cost estimates required above. See I-9 for additional requirements in connection with a state-required mechanism.

Please provide a detailed description of the financial mechanism to be used for closure costs.

Mr. Richard Karl - March 15, 1983

3.

I-8. Proof of liability coverage for sudden accidental occurrences must be submitted. 204.143

I-9. If the state-required financial mechanism for closure is being provided in lieu of a mechanism contained in 40 CFR 264.143, a letter requesting that the state mechanism be acceptable must be submitted.

This letter does not recommend denial of the Part B application but merely indicates the additional information needed to complete the review. Submittal of this information does not ensure a recommendation for approval of the application, nor does it preclude the Department from recommending requirement of additional information if the need is demonstrated through a more detailed review.

If you have any questions regarding this completeness review, please contact Robert Eckdale at (608) 267-7577 or Jim Reyburn at (414) 497-4397.

Sincerely,
Bureau of Solid Waste Management



William T. Rock, P.E., Chief
Hazardous Waste Management Section

WTR:RE:us/3311Y

cc: Systems Management Section - SW/3
Robert Eckdale - SW/3
Jim Reyburn - LMD

FEB 09 1983

5HW-13

Mr. William Rock
Wisconsin Department of Natural Resources
Box 8094
Madison, Wisconsin 53708

RE: Hazardous Waste Part B Permit Application

Facility EPA ID #: WID096828975
Facility Name: Peterson Builders Inc. - Plant 11
Facility Address: 107 E. Walnut, Sturgeon Bay, WI

Dear Mr. Rock:

Enclosed are two copies of the Part B application and correspondence for the above referenced facility.

Your agency is requested to perform a completeness check of the application, prepare comments and draft a deficiency letter if appropriate. Please forward the filled-in checklist, review comments, and draft letter to this office by March 14, 1983. This will allow my staff 2 weeks to review the comments and issue the letter before expiration of the allotted 60 day review period.

Please contact Richard Karl, the responsible U.S. EPA person at (312) 886-6160, if you have any questions regarding the application.

Sincerely yours,

William H. Miner, Chief
Technical, Permits and Compliance Section

Enclosures

bcc: Diane Bartelt (SS)
Richard Karl (S10)
LaNita Marrable, Versar

095-7

INITIALS	DATE	TYPIST	AUTHOR	P. E. U. GOMU	STU #1 RAIU CHIEF	STU #2 SPIS SEC.	TPCS SPIS CHIEF	WMD CHIEF	WMD DIR.	RA
			R. Karl 2/7/83	WEM 2/7/83			WEM 2/8/83			

5HW-13:RKARL:ap:6-7447:2/7/83



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

28 January 1983

RECEIVED

FEB 3 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

RCRA Activities
Part B Permit Application
USEPA Region V
P.O. Box A3587
Chicago, IL 60690-3587

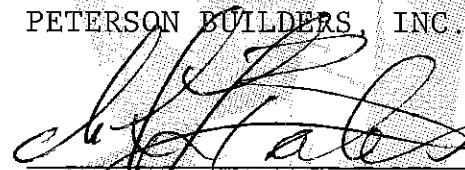
RE: EPA ID No. WID096828975

Dear Sir:

In accordance with my letter of 26 January 1983, please find the three additional copies of PBI's Part B Permit Application.

Sincerely,

PETERSON BUILDERS, INC.



John L. Beales

JLB/nc

Enclosures

2-3-83

COPY 1



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

26 January 1983

WASTE MANAGEMENT BRANCH
EPA REGION V

FEB 9 1983

RECEIVED

RCRA Activities
Part B Permit Application
USEPA Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

RE: EPA ID No. WID096828975

Dear Sir:

Enclosed is the Part B permit application for Peterson Builders, Inc., storage facility. Since submission is due prior to February 14, 1983, the original is being sent at this time. Three copies, including a copy you will forward to Wisconsin DNR, will be sent as soon as they have been prepared. We presently expect the copies to be ready within two weeks.

This manual has been prepared in an effort to comply with 40 C.F.R. and with Wis. Ad. Code NR-181.

If you should have any questions, please call (414) 743-5577 ext. 202.

Sincerely yours,

PETERSON BUILDERS, INC.

John L. Beales

JLB/nc

cc: JG w/o encl.
GH w/o encl.
Rick Karl, EPA w/o encl.
George Kraft, DNR w/o encl.

095-2

2-2-83

COPY 2

AUG 5 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary Higgins
Manager Industrial Engineer
Peterson Builders Inc.
101 Pennsylvania Street
Sturgeon Bay, Wisconsin 54235

544-100

RE: EPA ID No. # WID096828975

Dear Mr. Higgins:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute a Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than January 14, 1983. Please uniquely number each page of the application including all attachments (maps, specifications, etc.) A certification statement identical to the one stated in 40 CFR 122.6(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Richard Karl of my staff at (312) 886-7447, as you begin preparing your application. Richard Karl will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Wisconsin Department of Natural Resources, and if your application is acceptable, will strive for the simultaneous issuance of a Federal permit and a State license. If you have questions on the State license procedure they should be directed to Mr. Doug Rossherg at (414) 497-4047. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We look forward to receiving your Part B application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 122.25
40 CFR 264

cc: E. L. Peterson, President
Peterson Builders Inc.

Doug Rossherg, WDNR

bcc: Richard Karl

Mr. William Rock is the contact for State Program issues. However, as your facility is located in the Lake Michigan District, questions on the requirements for your facility should be directed to Doug Rossberg at (414) 497-4047.



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5574
TELEX 26-3423

In reply refer to:
GENERAL - 10042 - JLB
15 November 1985

WDNR - Lake Michigan District
1125 N. Military Avenue
Post Office Box 10448
Green Bay, WI 54307-0448

Attn: Don Johnston

Subj: Amendment of RCRA Permit WID 096828975

Encl: (1) RCRA Permit Application, Amendment 1 (10 copies)
(2) Feasibility and Plan of Operation Report Call-In, NR
181.435 Exemption

Dear Don:

Forwarded enclosed is a complete revision of PBI's Part A and Part B Permit Application. This revision is made to reflect recent PBI operating changes. The following amendments have been made to the applications presently on file:

1. The RCRA now requires a program to minimize the volume and hazards of wastes. PBI now reclaims on site. This has cut waste volume by 80 to 90%. The resulting waste is now solid rather than liquid. This minimizes potential environmental hazards in event of accidents.
2. Resulting wastes can no longer be recycled in Milwaukee. Incineration in Illinois is now required. PBI's closure bond has been increased to reflect the higher disposal costs.
3. Disposal costs are minimized if PBI can supply an entire truckload for each shipment. PBI has, therefore, raised the closure bond to allow storage of 100 barrels. This remains well within the facility's design capacity of 612 barrels.
4. Record keeping and manifest responsibilities are being shifted from the Industrial Engineering Department to the Warehousing/Transport Department. The plan reflects this change and personnel changes.

Mr. J. Soderlund, Vice President of Program Management, has signed the applications on Mr. Gagnon's behalf. Mr. Soderlund is acting as General Manager while Mr. Gagnon is absent for medical reasons.

095-41

15 November 1985

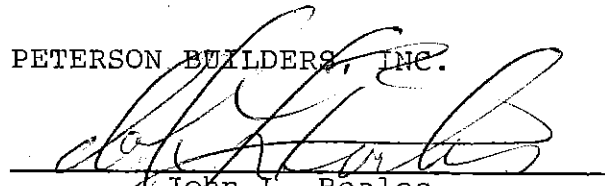
Enclosure (2) addresses the Feasibility Plan and Operation Report required by NR 181. PBI's operations are considered to be exempt from these requirements under the provisions of NR 181.435.

It is requested that copies of enclosure (1) be forwarded to EPA/DNR-Madison for processing as necessary and DNR concurrence with enclosure (2) be forwarded.

The enclosed application labelled "Copy 1" contains the original signature pages.

Thank you for your continued cooperation with and assistance to PBI.

PETERSON BUILDERS, INC.


John L. Beales
Hazardous Waste Manager

JLB:sks

cc: E. L. Peterson/JG/DJ w/o encl.
PMO w/o encl.
Industrial Engineering w/o encl.
G. Karnopp w/o encl.
J. Beales w/encl.

FEASIBILITY AND PLAN OF OPERATION REPORT CALL-IN
STATE OF WISCONSIN

Ref : (a) WDNR Letter File 3200 of 26 September 1985

Exemption from Wisconsin Feasibility and Plan of Operation Reports is provided by NR 181.435(2) under the following circumstances:

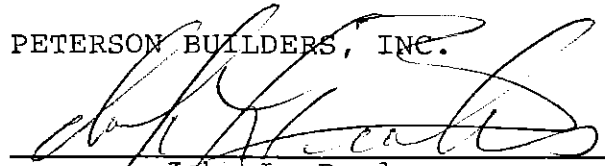
A. NR 181.435(2) - The facility has the following characteristics:

1. NR 181.435(1)(a) - Waste is stored entirely in a closed, roofed structure having access limited or restricted to employees or other authorized personnel. PBI's facility meets this criteria.
2. NR 181.435(1)(b) - Storage is confined to a floor area of 1500 square feet or less. PBI's storage area is 1022.4 square feet.
3. NR 181.435(1)(c) - Waste storage does not exceed 10,000 gallons. As amended, PBI's license would increase authorized storage to only 5,500 gallons.
4. NR 181.435(d) - Waste is stored generally for the purpose of accumulating economical transfer loads. PBI's facility meets this criteria.
5. NR 181.435(e) - All storage is above ground or in containers. PBI stores all waste in containers.
6. NR 181.435(2) - The facility has and complies with a Federal license. The facility is licensed as WID 096828975 and receives annual compliance checks by WDNR.

Peterson Builders, Inc., has on file with WDNR a Part B application which substantiates the above noted criteria. Verification and compliance inspections have been conducted and documented by EPA and WDNR-Great Lakes Region.

Peterson Builders, Inc., therefore, believes that the reference (a) Call-in of Feasibility and Plan of Operation Reports is not applicable to this facility. WDNR concurrence with this view is requested.

PETERSON BUILDERS, INC.



John L. Beales
Hazardous Waste Manager

JLB:sks

ENCLOSURE (2)

PETERSON BUILDERS, INCORPORATED

STURGEON BAY, WISCONSIN

HAZARDOUS WASTE FACILITY PERMIT APPLICATION
(AMENDMENT #1)

NOVEMBER 1985

TABLE OF CONTENTS

SECTION A	PART A APPLICATION
SECTION B	FACILITY DESCRIPTION
SECTION C	WASTE CHARACTERISTICS AND WASTE ANALYSIS
SECTION D	PROCESS INFORMATION
SECTION E	GROUNDWATER MONITORING SYSTEMS
SECTION F	PROCEDURES TO PREVENT HAZARDS
SECTION G	CONTINGENCY PLAN
SECTION H	TRAINING PROGRAM
SECTION I	CLOSURE PLAN AND FINANCIAL REQUIREMENTS
SECTION J	OTHER FEDERAL LAWS
	CERTIFICATION
APPENDIX A	HAZARDOUS CHARACTERISTICS OF MATERIALS
APPENDIX B	INSPECTION LOG SHEETS
APPENDIX C	FINANCIAL MECHANISM

SECTION A

PART A APPLICATION

FORM 3510-1 GENERAL	 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> F W I D 0 9 6 8 2 8 9 7 5 </div>
--------------------------------------	----------------	--	--

II. LABEL ITEMS

A. I.D. NUMBER

B. FACILITY NAME

C. FACILITY MAILING ADDRESS

D. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

III. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column of the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1. NAME PETERSON BUILDERS INCORPORATED

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
GARY HIGGINS	414 743 5577

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
101 PENNSYLVANIA STREET			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
STURGEON BAY		WI	54235

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
107 E WALNUT			
B. COUNTY NAME			
OOR			
C. CITY OR TOWN		D. STATE	E. ZIP CODE
STURGEON BAY		WI	54235
		F. COUNTY CODE (if known)	
		015	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	7	3	7	3	6	2
(specify) Shipbuilding & repair				(specify) Industrial Trucks			
C. THIRD				D. FOURTH			
7				7			
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the name of the facility?																	
PETERSON BUILDERS, INCORPORATED												<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)																			
F = FEDERAL		M = PUBLIC (other than federal or state)		P = PRIVATE		O = OTHER (specify)		P		4		1		4		7		4		3		5		5		7		7	
E. STREET OR P.O. BOX																													
101 PENNSYLVANIA STREET																													
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND															
B STURGEON BAY										WI		54235		Is the facility located on Indian land?															
														<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO															

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
E. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										(specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

See Section B of permit application

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Joseph Gagnon Vice President - General Manager		

COMMENTS FOR OFFICIAL USE ONLY

C	
C	

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
1 2 3 4 5 6 7 8 9 10 11 12 W I D 0 9 6 8 2 8 9 7 5 1													1 2 3 4 5 6 7 8 9 10 11 12 W DUP 2 DUP													
DESCRIPTION OF HAZARDOUS WASTES (continued)																										
J NO JZ	A. EPA HAZARD. WASTE NO. (enter code)					B. ESTIMATED ANNUAL QUANTITY OF WASTE					C. UNIT OF MEASURE (enter code)		D. PROCESSES													
													1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
	23	24	25	26	27	28	29	30	31	32	33	34	27	28	27	28	27	28	27	28	27	28	27	28	27	28
1	D	0	0	1		6,600					G		S	0	1											
2																										
3																										
4																										
5																										
6																										
7																										
8																										
9																										
10																										
11																										
12																										
13																										
14																										
15																										
16																										
17																										
18																										
19																										
20																										
21																										
22																										
23																										
24																										
25																										
26																										

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

8	7	2	2	3	8	T/A	C
F	W	I	D	0	9	6	8
2	8	9	7	5			6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

8	7	2	2	3	8
65	66	67	68	69	71

4	4	4	9	1	2
72	73	74	75	76	79

VIII. FACILITY OWNER
☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00
----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00
----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																	
W	W	I	D	0	9	6	8	2	8	9	7	5	T/A	C	W	W	I	D	0	9	6	8	2	8	9	7	5	T/A	C	
1	2	3	4	5	6	7	8	9	0	1	2	3	13	14	15	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5
DESCRIPTION OF HAZARDOUS WASTES (continued)																														
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES																			
	23	24	25	26	27	28	29	30	31	32	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
1	F	0	0	5	6,600				G		S	0	1																	
2	F	0	0	2	660				G		S	0	1																	
3	F	0	0	3	660				G		S	0	1																	
4																														
5																														
6																														
7																														
8																														
9																														
10																														
11																														
12																														
13																														
14																														
15																														
16																														
17																														
18																														
19																														
20																														
21																														
22																														
23																														
24																														
25																														
26																														

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

F	W	I	D	0	9	6	8	2	8	9	7	5	T/A	C
														6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

8	7	2	2				
65	66	67	68	69	70	71	

		4	4	4	9		
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

1. NAME OF FACILITY'S LEGAL OWNER												2. PHONE NO. (area code & no.)																			
3. STREET OR P.O. BOX												4. CITY OR TOWN												5. ST.				6. ZIP CODE			

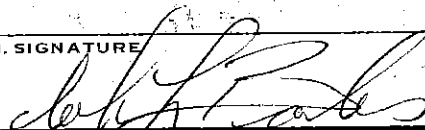
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

JOHN L. BEALES
Corporate Counsel

B. SIGNATURE



C. DATE SIGNED

14 December 1983

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

JOHN L. BEALES
Corporate Counsel

B. SIGNATURE



C. DATE SIGNED

14 December 1983

Date: 1/20/83

Revision: 1

MAP 1

B-4

Mapped, edited, and published by the Geological Survey and the National Ocean Survey in cooperation with the Wisconsin Division of Highways and Wisconsin Geological and Natural History Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1954-55. Revised from aerial photographs taken 1978
Field checked 1980. Map edited 1981

Bathymetry compiled by the National Ocean Survey from tide-coordinated hydrographic surveys. This information is not intended for navigational purposes

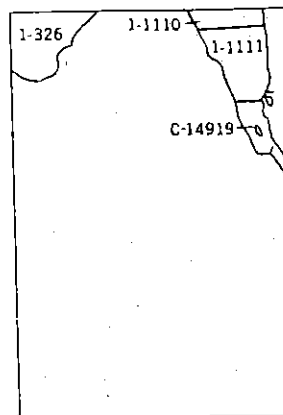
Projection and 10,000-foot grid ticks: Wisconsin coordinate system, central zone (Lambert conformal conic)
1000-meter Universal Transverse Mercator grid, zone 16
1927 North American Datum
To place on the predicted North American Datum 1983 move the projection lines 4 meters north and 5 meters east as shown by dashed corner ticks

There may be private inholdings within the boundaries of the National or State reservations shown on this map

Red tint indicates areas in which only landmark buildings are shown

Fine red dashed lines indicate selected fence and field lines where generally visible on aerial photographs
This information is unchecked

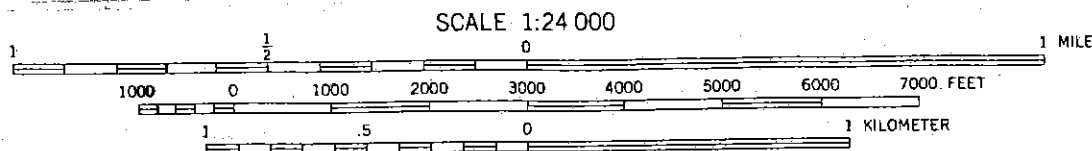
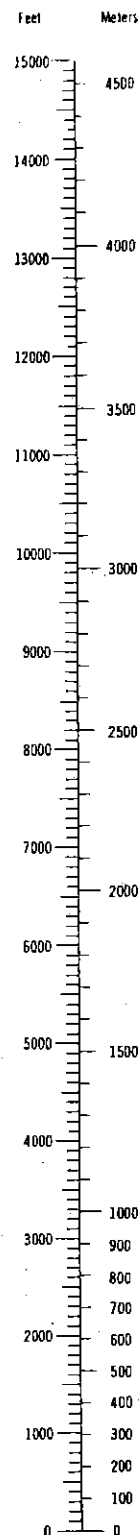
NATIONAL OCEAN SURVEY HYDROGRAPHIC SURVEY INDEX



HYDROGRAPHIC SURVEY INFORMATION

Survey Number	Survey Date	Survey Scale	Survey Line spacing (Naut. Miles)
1-326	1865	1:16,000	05-15
1-1110	1906	1:10,000	03-40
1-1111	1906	1:10,000	02-10
NOS CHART 14919		AUG. 2, 1980	1:10,000

CONVERSION SCALES



CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 2.5 FOOT CONTOURS ALONG SHORELINE
NATIONAL GEODETIC VERTICAL DATUM OF 1929
BATHYMETRIC CONTOUR INTERVAL 1 METER
WITH SUPPLEMENTARY 0.5 METER CONTOURS
DATUM IS LOW WATER 576.8 FEET
INTERNATIONAL GREAT LAKES DATUM OF 1955

BASE MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
BATHYMETRIC SURVEY DATA COMPLIES WITH INTERNATIONAL HYDROGRAPHIC ORGANIZATION (IHO) SPECIAL PUBLICATION 44 ACCURACY STANDARDS AND/OR STANDARDS USED AT THE DATE OF THE SURVEY
FOR SALE BY THE U.S. GEOLOGICAL SURVEY, RESTON VIRGINIA 22092
NATIONAL OCEAN SURVEY, ROCKVILLE, MARYLAND 20852
AND WISCONSIN GEOLOGICAL AND NATURAL HISTORY SURVEY
MADISON, WISCONSIN 53706
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

ROAD CLASSIFICATION

Primary highway, hard surface _____ Light-duty road, hard or improved surface _____
Secondary highway, hard surface _____ Unimproved road _____
○ Interstate Route □ U. S. Route ○ State Route



QUADRANGLE LOCATION

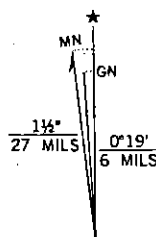
STURGEON BAY WEST, WIS

SW/4 STURGEON BAY 15' QUADRANGLE

N4445-W8722.5/7.5

1981

DMA 3573 IV SW-SERIES V861



UTM GRID AND 1981 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

Feet Meters

1	3048
2	6096
3	9144
4	12192
5	15240
6	18288
7	21336
8	24384
9	27432
10	30480

To convert feet to meters multiply by .3048

To convert meters to feet multiply by 3.2808



State of Wisconsin Dept. of Natural Resources

HAZARDOUS WASTE FACILITY INTERIM LICENSE

AUTHORIZED CONTACT

Gary Higgins - Manager Ind. Eng.
Peterson Builders, Inc.
101 Pennsylvania St.
Sturgeon Bay, WI 54235

EPA I.D. NO: WID 096828975

DATE ISSUED: April 27, 1983

TYPE OF FACILITY: Storage

Containers fifty; 55-gallon drums
(2750 gallons)

LICENSEE: Peterson Builders Inc.

NAME OF FACILITY: Peterson Builders Inc.

LOCATION OF FACILITY: 107 E. Walnut
Sturgeon Bay, Door County, WI

THIS LICENSE AUTHORIZES THE LICENSEE TO OPERATE THE HAZARDOUS WASTE FACILITY DESCRIBED ABOVE. THIS LICENSE IS SUBJECT TO AND CONDITIONED UPON COMPLIANCE WITH THE PROVISIONS OF CHAPTER 144, WISCONSIN STATUTES, CHAPTER NR 181, WISCONSIN ADMINISTRATIVE CODE, ANY PLAN APPROVAL AND MODIFICATIONS THEREOF, ANY SPECIAL ORDER AND MODIFICATIONS THEREOF ISSUED BY THE DEPARTMENT AND THE ATTACHED CONDITIONS. ANY EXEMPTIONS FROM THE REQUIREMENTS OF CHAPTER NR 181, WISCONSIN ADMINISTRATIVE CODE, ISSUED FOR THIS FACILITY ARE LISTED ABOVE. THIS LICENSE DOES NOT RELIEVE THE LICENSEE OF THE LEGAL OBLIGATION TO MEET ALL OTHER STATE, FEDERAL AND LOCAL PERMIT, ZONING AND REGULATORY REQUIREMENTS.

Carroll D. Besadny
CARROLL D. BESADNY, SECRETARY
DEPARTMENT OF NATURAL RESOURCES

FORM 3 RCRA	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program <small>(This information is required under Section 3005 of RCRA.)</small>	I. EPA I.D. NUMBER											
			W I D 0 9 6 8 2 8 9 7 5 T/A C											
			1 2 3 4 5 6 7 8 9 10 11 12											

FOR OFFICIAL USE ONLY									
DATE RECEIVED (yr., mo., & day)		COMMENTS							
23 24 25 26 27 28 29									

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ **1. EXISTING FACILITY** (See instructions for definition of "existing" facility. Complete item below.)

☐ **2. NEW FACILITY** (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
8 0	0 5	1 9

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ **1. FACILITY HAS INTERIM STATUS**

☐ **2. FACILITY HAS A RCRA PERMIT**

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. **AMOUNT** - Enter the amount.

2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
posal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C T/A C															
1 2 3 4 5 6 7 8 9 10															
13 14 15															
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY					FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY					FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)		2. UNIT OF MEAS- URE (enter code)		1. AMOUNT				2. UNIT OF MEAS- URE (enter code)					
X-1	S 0 2	600		G				5							
X-2	T 0 3	20		E			6								
1	S 0 1	5500					7								
							8								
							9								
3															
4							10								

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																		
W I D 0 9 6 8 2 8 9 7 5													W DUP																		
DESCRIPTION OF HAZARDOUS WASTES (continued)																															
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																											
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																							
				23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	F 0 0 5	1,100 6600	G														S 0 1														
2	F 0 0 2	1,100 660	G														S 0 1														
3	F 0 0 3	11,000 660	G														S 0 1														
4	D 0 0 5	220	G														S 0 1														
5	4 0 2 8	220	G														S 0 1														
6																															
7																															
8																															
9																															
10																															
11																															
12																															
13																															
14																															
15																															
16																															
17																															
18																															
19																															
20																															
21																															
22																															
23																															
24																															
25																															
26																															

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)																
5	4	3	2	1	0	9	8	7	6	5	4	3	2	1	T/A	C
F	W	I	D	0	9	6	8	2	8	9	7	5			6	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
8	7	0	2	2						4	4	0	4	9					
55	56	57	58	59	60	61	62	63	64	72	73	74	75	76	77	78	79	80	81

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																								
3. STREET OR P.O. BOX															4. CITY OR TOWN															5. ST.					6. ZIP CODE				

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	
J. Gagnon		<i>Jack Soderlund VP</i>		15 October 1985	
Vice President/General Manager					

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	
J. Gagnon		<i>Jack Soderlund VP</i>		15 October 1985	
Vice President/General Manager					

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			F W I D 0 9 6 8 2 8 9 7 5 1											

FOR OFFICIAL USE ONLY

APPLICATION PROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 25 26 27 28 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)	
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)	
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN	
C 8 YR. 80 MO. 05 DAY 19		C 71 YR. MO. DAY	
13 73 74 75 76 77 78		73 74 75 76 77 78	
B. REVISED APPLICATION (place an "X" below and complete Item I above)		2. FACILITY HAS A RCRA PERMIT	
<input checked="" type="checkbox"/> 1. FACILITY HAS INTERIM STATUS		<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT	
C 72		C 73	

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. **AMOUNT** - Enter the amount.

2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
		UNIT OF MEASURE CODE			UNIT OF MEASURE CODE
GALLONS		G	LITERS PER DAY		V
LITERS		L	TONS PER HOUR		D
CUBIC YARDS		Y	METRIC TONS PER HOUR		W
CUBIC METERS		C	GALLONS PER HOUR		E
GALLONS PER DAY		U	LITERS PER HOUR		H
			ACRE-FEET		A
			HECTARE-METER		F
			ACRES		B
			HECTARES		Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP												T/A C 1													
13 14 15												13 14 15													
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)					2. UNIT OF MEASURE (enter code)								1. AMOUNT					2. UNIT OF MEASURE (enter code)					
X-1	S 0 2	600					G						5												
X-2	T 0 3	20					E						6												
1	S 0 1	11,000					G						7												
													8												
													9												
3													10												
4																									
16 17 18 19												27 28 29 30 31 32													

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS. T

METRIC UNIT OF MEASURE CODE
KILOGRAMS. K
METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Notes: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

V. FACILITY DRAWING (see page 4)

See Section B

Date: 1/20/83

Revision: 1

B

SECTION B

FACILITY DESCRIPTION

Facility Description

B-1 General Description

Peterson Builders, Incorporated (hereinafter PBI) is located in Sturgeon Bay, Wisconsin. The street address is:

Peterson Builders, Incorporated
107 East Walnut
Sturgeon Bay, WI 54235

The mailing address is:

Peterson Builders, Incorporated
P.O. Box 47
Sturgeon Bay, WI 54235

This facility is primarily a manufacturer of large boats and ships. In addition, PBI manufactures trucks used in the air transport industry. Hazardous wastes are generated by metal painting operations, and by fiberglass operations.

The facility is maintained because PBI has concluded that storing accumulated materials off-site enhances personnel safety and environmental safety. To minimize risks of damage to the environment or personal injury, PBI has chosen to transport these wastes to another location in Sturgeon Bay where the waste can be stored for up to 90 days or slightly longer. In order to comply with state and federal waste transport regulations, these shipments must be accompanied by a manifest document. Whenever a

Date: 1/20/83

Revision: 1

B

waste shipment is manifested, it must be manifested to a permitted hazardous waste facility. Although Peterson could comply with the generation accumulation requirements for shipment off site within 90 days, the transport situation has required that Peterson obtain a permit for this facility.

The contact and party responsible for the hazardous waste management activities at Peterson Builders is:

Gary Higgins

Manager - Industrial Engineering

414-743-5577

B-2 Facility Drawing

Drawing 1 is a sketch showing the general layout of the facility including the building, waste storage areas and other details. It should be noted that the area surrounding the PBI facility, for a greater distance than could be expected to be affected by a spill from such a minor storage area, was levelled in 1962 to create an industrial park. Within the industrial park, the land rises at the approximate rate of 1:2,000. Runoff would be in a northeasterly direction.

B-3 Location information**B-3a Seismic standard**

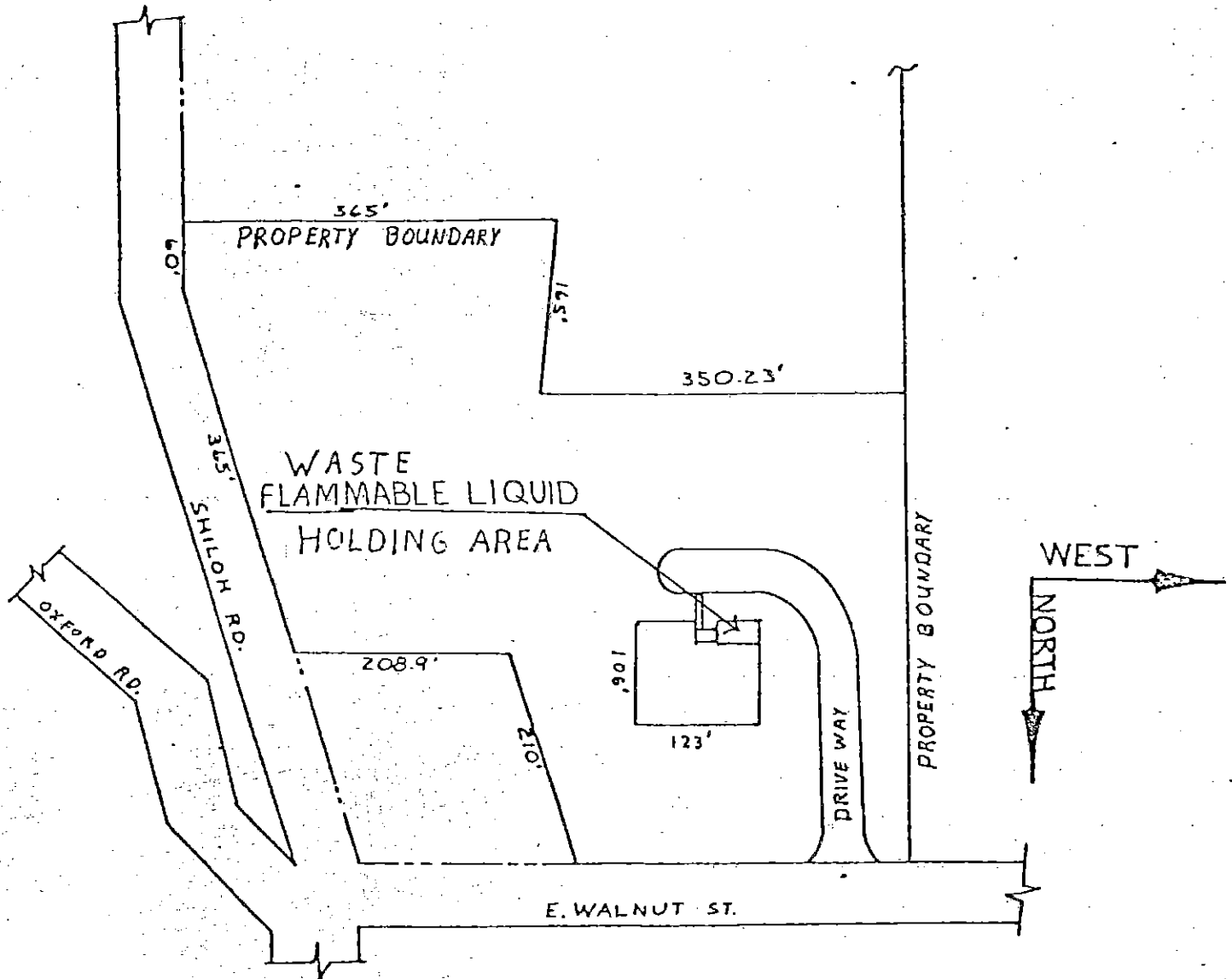
Because this is an existing rather than a new facility, the seismic standard does not apply. Facility exemption from requirements of seismic mapping by 40 CFR 264 Appendix VI.

B-3b Flood plain standard

The Peterson Builders Incorporated hazardous waste storage facility is not located in a 100 year flood plain. (See Map 2)

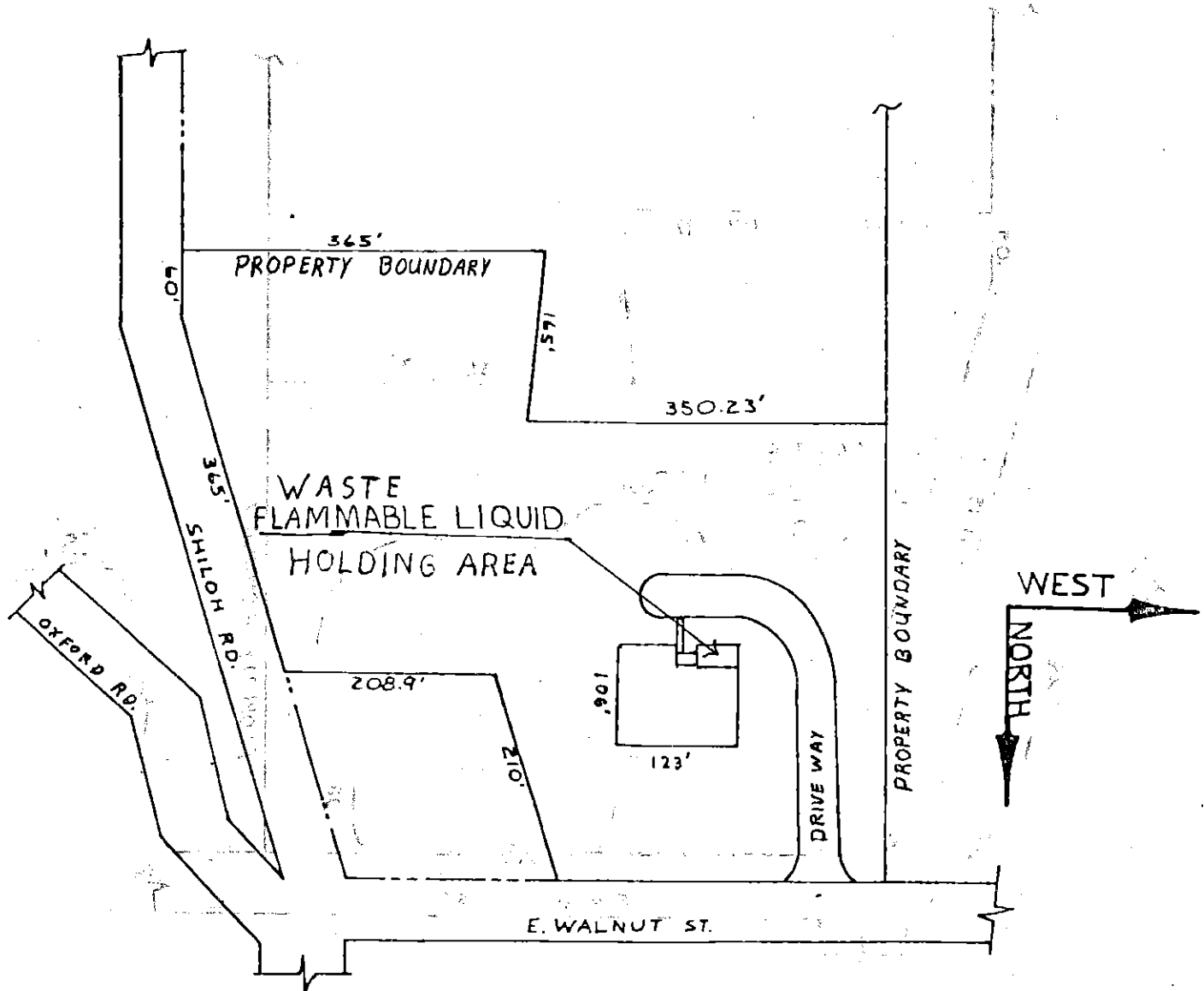
The shaded areas designated as Zone A represent the 100 year flood plain.

DRAWING #1

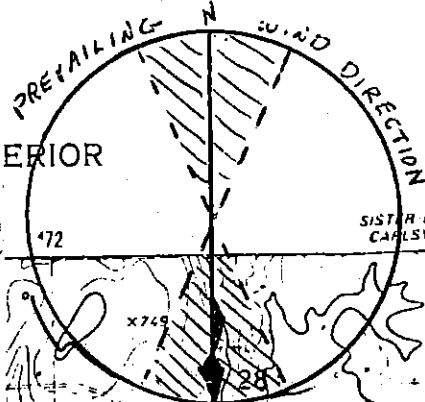
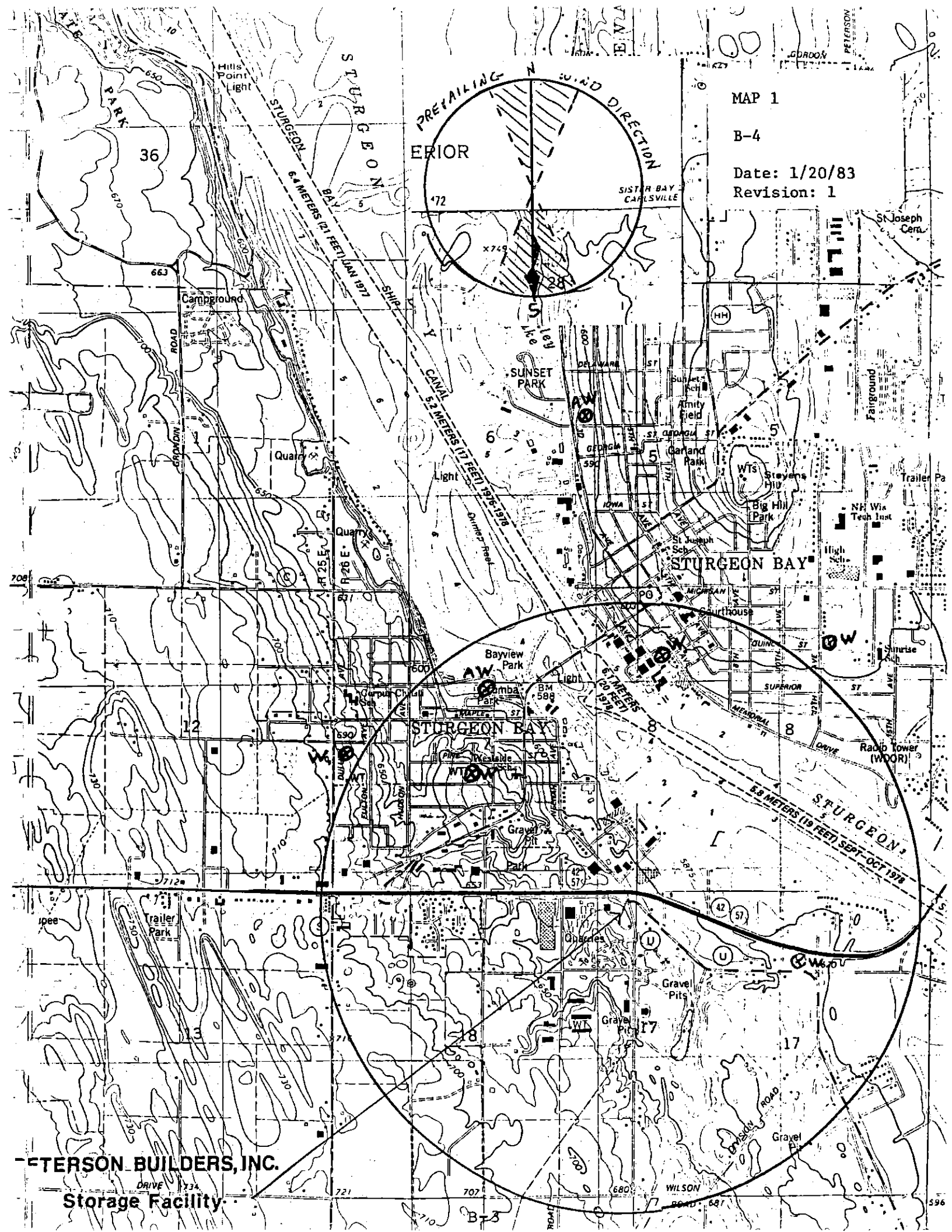


PLOT MAP FOR P.B.I.
FLAMMABLE LIQUIDS WAREHOUSE

DRAWING #1



PLOT MAP FOR P.B.I.
FLAMMABLE LIQUIDS WAREHOUSE



MAP 1

B-4

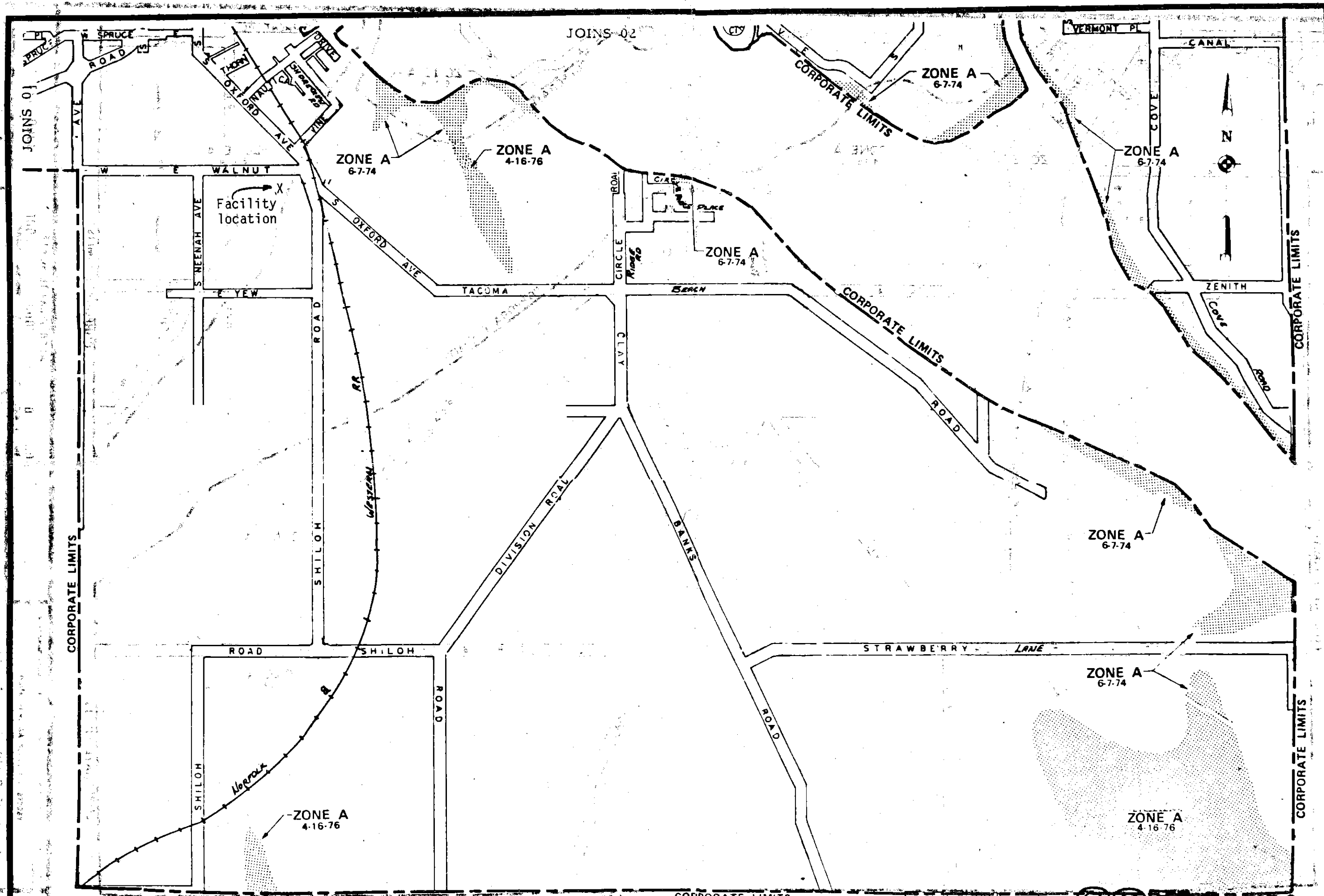
Date: 1/20/83

Revision: 1

PETERSON BUILDERS, INC.
Storage Facility

B-3

596



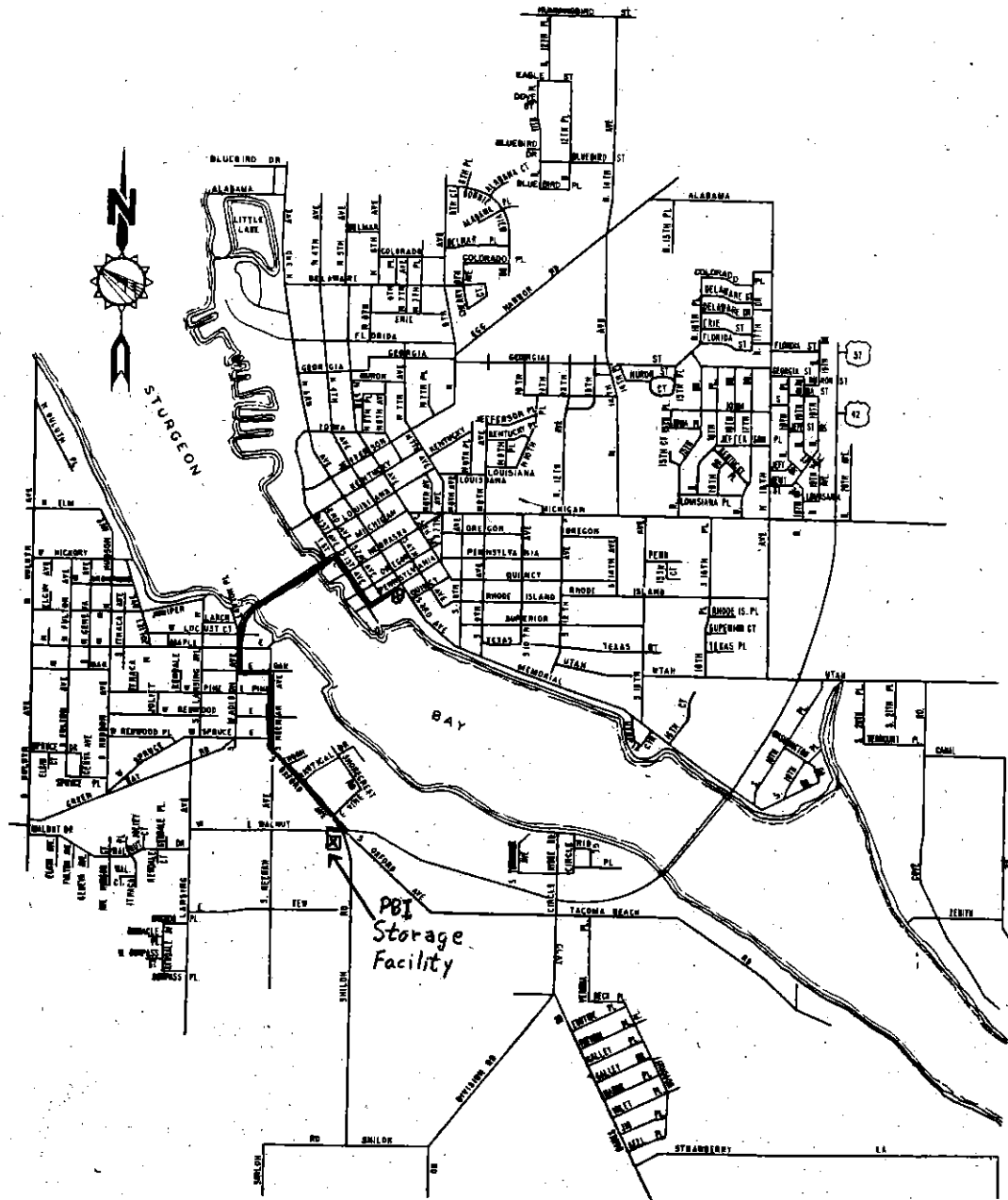
FIA FLOOD HAZARD BOUNDARY MAP No. H03		APRIL 16, 1976 Map Revised	
Federal Insurance Administration CITY OF STURGEON BAY, WI (DOOR CO.)		03	

RECEIVED
2-2-83

COPY 2 MAP 2

APPROXIMATE SCALE
500 0 1000 2000 3000 FEET

STURGEON BAY



Mapped, edited, and published by the Geological Survey and the National Ocean Survey in cooperation with the Wisconsin Division of Highways and Wisconsin Geological and Natural History Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1954-55. Revised from aerial photographs taken 1978. Field checked 1980. Map edited 1981

Bathymetry compiled by the National Ocean Survey from tide-coordinated hydrographic surveys. This information is not intended for navigational purposes

Projection and 10,000-foot grid ticks: Wisconsin coordinate system, central zone (Lambert conformal conic) 1000-meter Universal Transverse Mercator grid, zone 16 1927 North American Datum

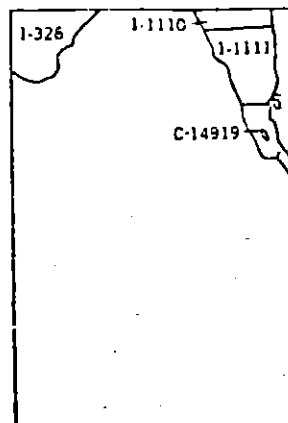
To place on the predicted North American Datum 1983 move the projection lines 4 meters north and 5 meters east as shown by dashed corner ticks

There may be private inholdings within the boundaries of the National or State reservations shown on this map

Red tint indicates areas in which only landmark buildings are shown

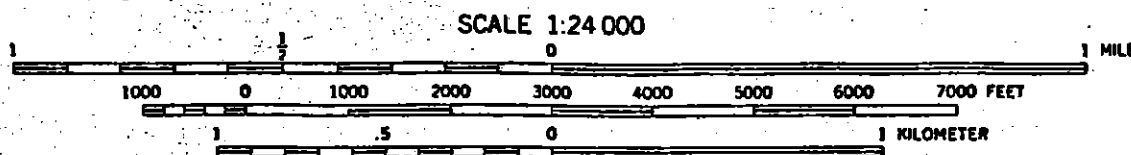
Fine red dashed lines indicate selected fence and field lines where generally visible on aerial photographs. This information is unchecked.

NATIONAL OCEAN SURVEY HYDROGRAPHIC SURVEY INDEX



HYDROGRAPHIC SURVEY INFORMATION

Survey Number	Survey Date	Survey Scale	Survey Line spacing (Naut. Miles)
1-326	1865	1:16,000	.05-.15
1-1110	1906	1:10,000	.03-.40
1-1111	1906	1:10,000	.02-.10
NOS CHART 14919 AUG. 2, 1980 1:10,000			



CONTOUR INTERVAL 10 FEET
 DOTTED LINES REPRESENT 2.5 FOOT CONTOURS ALONG SHORELINE
 NATIONAL GEODETIC VERTICAL DATUM OF 1929
 BATHYMETRIC CONTOUR INTERVAL 1 METER
 WITH SUPPLEMENTARY 0.5 METER CONTOURS
 DATUM IS LOW WATER 576.8 FEET
 INTERNATIONAL GREAT LAKES DATUM OF 1955

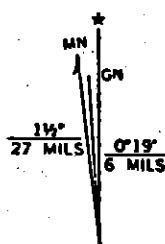
BASE MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
 BATHYMETRIC SURVEY DATA COMPLIES WITH INTERNATIONAL HYDROGRAPHIC ORGANIZATION (IHO) SPECIAL PUBLICATION 44 ACCURACY STANDARDS AND/OR STANDARDS USED AT THE DATE OF THE SURVEY
 FOR SALE BY THE U.S. GEOLOGICAL SURVEY, RESTON VIRGINIA 22092
 NATIONAL OCEAN SURVEY, ROCKVILLE, MARYLAND 20852
 AND WISCONSIN GEOLOGICAL AND NATURAL HISTORY SURVEY
 MADISON, WISCONSIN 53706
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

ROAD CLASSIFICATION

Primary highway, hard surface _____ Light-duty road, hard or improved surface _____
 Secondary highway, hard surface _____ Unimproved road _____
 ○ Interstate Route ○ U. S. Route ○ State Route



QUADRANGLE LOCATION



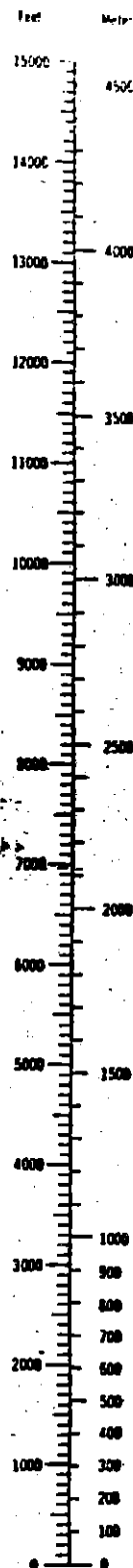
STURGEON BAY WEST, WIS

SW/4 STURGEON BAY 15' QUADRANGLE
 N4445-W8722.5/7.5

1981

DMA 3573 IV SW-SERIES V861

CONVERSION SCALES



Feet Meters

1	3048
2	6096
3	9144
4	12192
5	15240
6	18288
7	21336
8	24384
9	27432
10	30480

To convert feet to meter multiply by .3048

waste shipment is manifested, it must be manifested to a permitted hazardous waste facility. Although Peterson could comply with the generation accumulation requirements for shipment off site, within ninety (90) days, for safety and security, PBI stores the waste in a secure warehouse. A permit is required to allow this safer method of operation.

The contact and party responsible for the hazardous waste management activities at Peterson Builders is:

John Beales

Manager - Hazardous Wastes

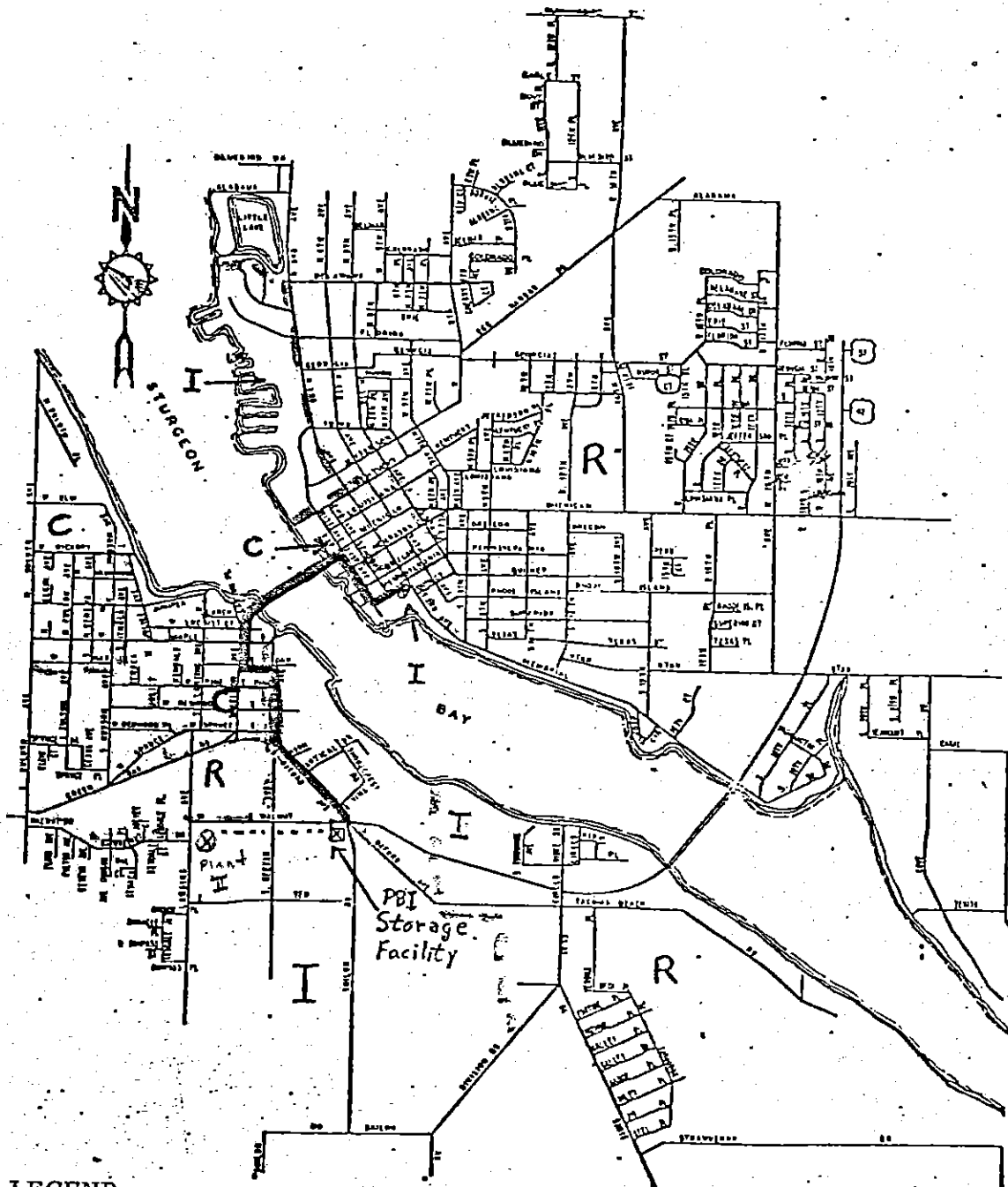
(414) 743-5577

B-2 Facility Drawing

Drawing 1 is a sketch showing the general layout of the facility including the building, waste storage areas and other details. It should be noted that the area surrounding the PBI facility, for a greater distance than could be expected to be affected by a spill from such a minor storage area, was levelled in 1962 to create an industrial park. Within the industrial park, the land rises at the approximate rate of 1:2,000. Run-off would be a northeasterly direction.

B-3 Location Information

STURGEON BAY

ZONING LEGEND

I = industrial; C = commercial; R = residential. Zoning in Sturgeon Bay may vary slightly. Residential sections may contain small areas of industrial or commercial zoned property. Industrial zoned, however, does not contain enclaves of residential zoning. This map depicts the broad outlines of local zoning without differentiating between classes of residential zoning.

B-4 Traffic patterns

Map 3 traces the traffic pattern of waste movement from the point of generation to the storage facility.

The waste originated at the 101 Pennsylvania Painting area is transported south on Pennsylvania for 2 blocks. A right turn is made on 1st Street for 3 blocks to Michigan. The truck then moves south on Michigan for approximately 6 blocks to Oak Street. A left on Oak for 1 block to Neenah, a right on Neenah for approximately 3 blocks to Oxford. A left on Oxford for 3 blocks to Walnut. A right on Walnut to the facility driveway.

Waste originated at plant two is transported along Walnut Street for two blocks from Plant II to the Warehouse.

Load bearing capacity

All roads are capable of bearing loads up to 50,000 pounds per axel. PBI trucks used for carrying waste have a curb weight of less than 7,000 lbs. Maximum truck load is 10 barrels at approximately 450 lb/barrel. Gross vehical weight is below 11,500 pounds.

When a specific chemical will no lnger be used at PBI, it may become necessary to transport up to four drums to an approved incinerator. In such event, Material Handling Department will make arrangements with the incinerator. Transport will follow state or Interstate highways wherever possible.

Traffic control signals

Not applicable.

B-3a Seismic Standard

Because this is an existing rather than a new facility, the seismic standard does not apply. Facility exemption from requirements of seismic mapping by 40 CFR 264 Appendix VI.

B-3b Flood Plain Standard

The Peterson Builders, Incorporated hazardous waste storage facility is not located in a 100 year flood plain.

(See Map 2)

The shaded areas designated as Zone A represent the 100 year flood plain.

B-3c Zoning

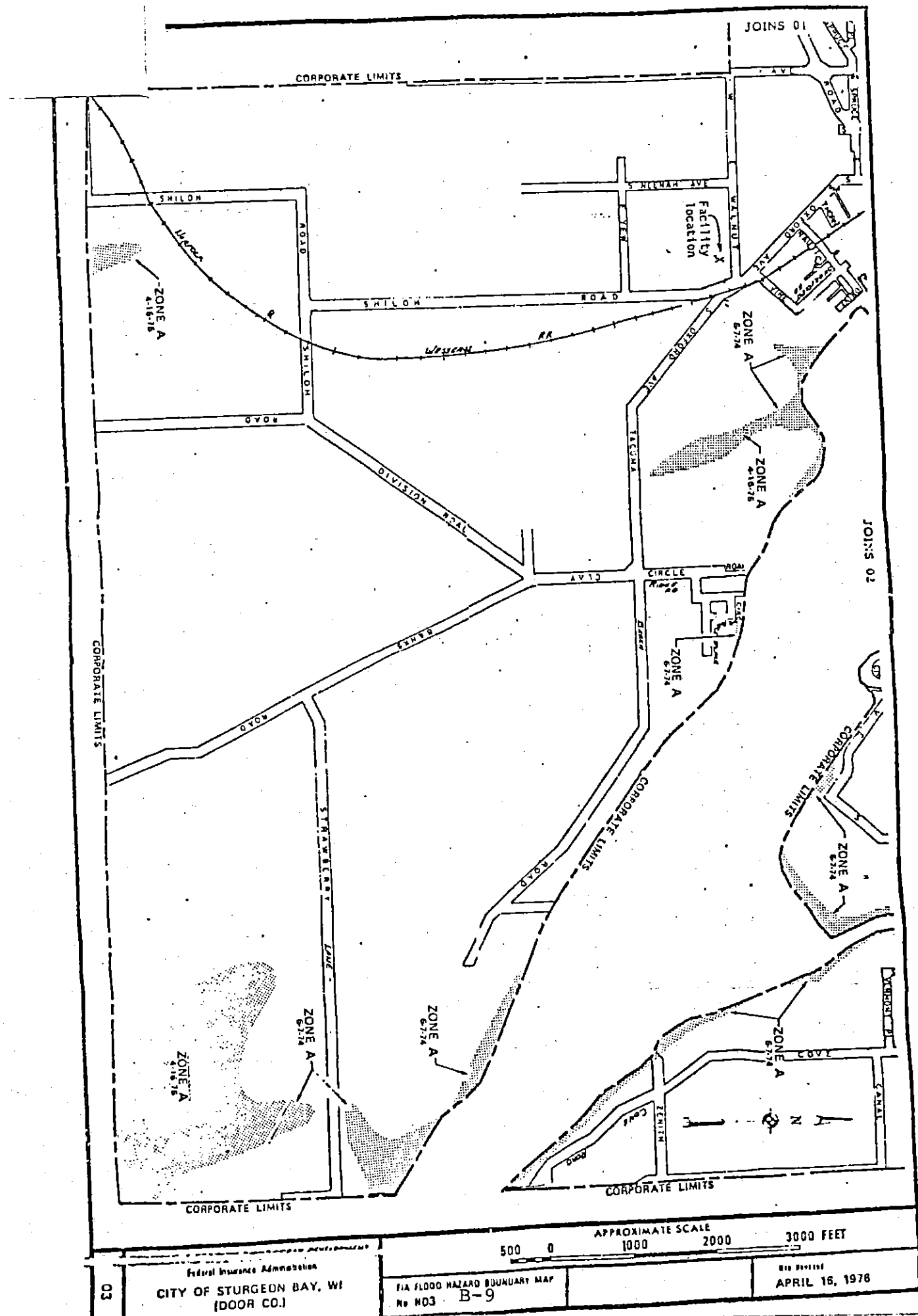
Local zoning is shown on Map 3. Land use substantially conforms to zoning.

B-3d Water Intakes

The City of Sturgeon Bay receives water from seven wells. Two of those wells are artesian. The well locations are shown on Map 1 as either W or AW.

By City ordinance, no drinking water may be taken from private wells. No cross connects to private wells are allowed.

Depth of the local water table is 150 feet.



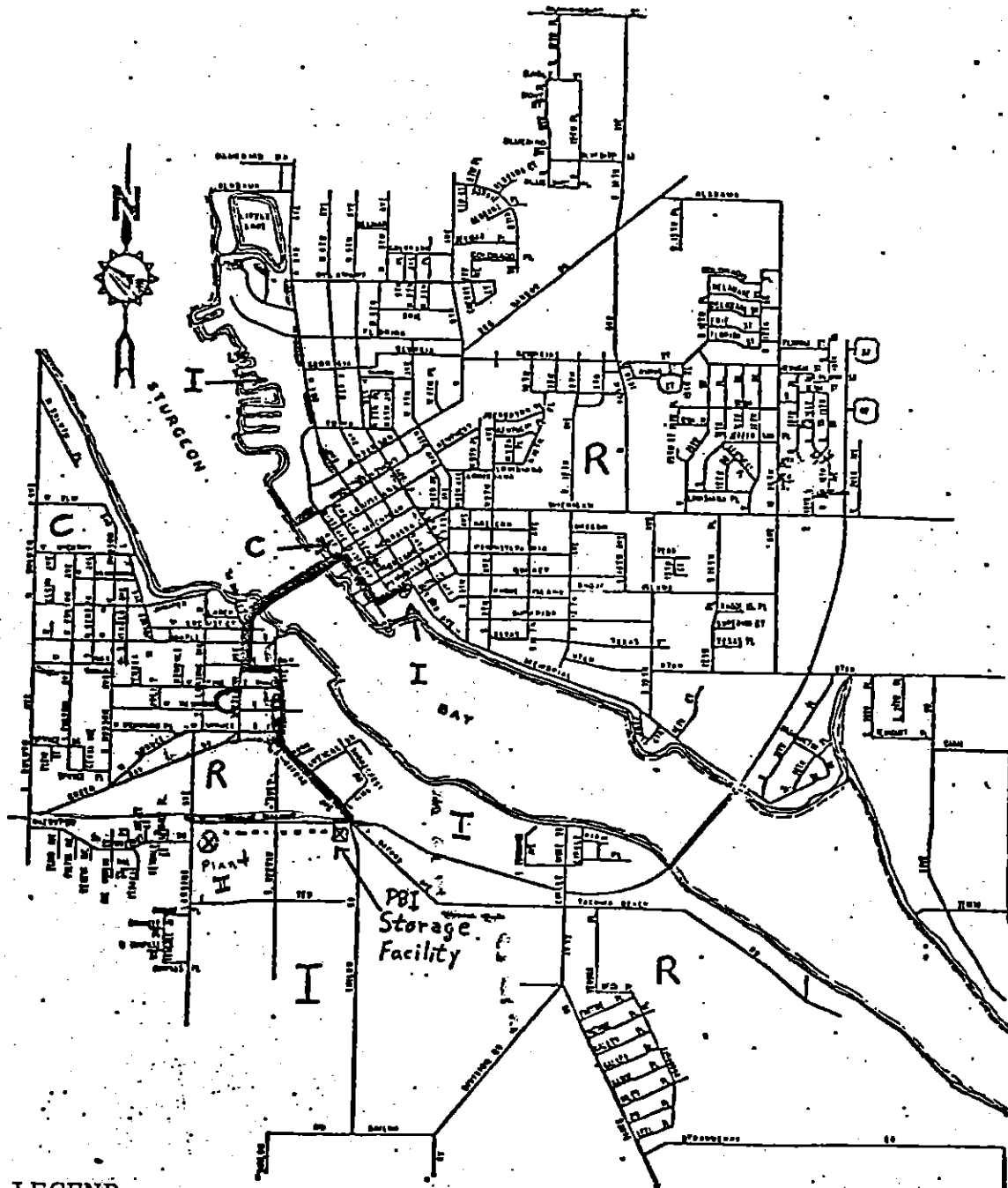
03

Federal Insurance Administration
CITY OF STURGEON BAY, WI
(DOOR CO.)

FIA FLOOD HAZARD BOUNDARY MAP
No M03 B-9

Not Revised
APRIL 16, 1978

STURGEON BAY

ZONING LEGEND

I = industrial; C = commercial; R = residential. Zoning in Sturgeon Bay varies slightly. Residential sections may contain small areas of industrial or commercial zoned property. Industrial zoned, however, does not contain enclaves of residential zoning. This map depicts the broad outlines of local zoning without differentiating between classes of residential zoning.

B-3e Prevailing Wind

Prevailing winds are variably from the NNE or NNW. Map 1 shows wind from due North as a median.

B-4 Traffic Patterns

Map 3 traces the traffic pattern of waste movement from the point of generation to the storage facility.

The waste originated at the 101 Pennsylvania Painting area is transported south on Pennsylvania for two (2) blocks. A right turn is made on First Street for three (3) blocks to Michigan. The truck then moves south on Michigan for approximately six (6) blocks to Oak Street. A left on Oak for one (1) block to Neenah, a right on Neenah for approximately three (3) blocks to Oxford. A left on Oxford for three (3) blocks to Walnut. A right on Walnut to the facility driveway.

Waste originated at Plant II is transported along Walnut Street for two (2) blocks from Plant II to the Warehouse.

Load Bearing Capacity

All roads are capable of bearing loads up to 50,000 pounds per axle. PBI trucks used for carrying waste have a curb weight of less than 7,000 lbs. Maximum truck load is ten (10) barrels at approximately 450 lb/barrel. Gross vehicle weight is below 11,500 pounds.

When a specific chemical will no longer be used at PBI, it may become necessary to transport up to four (4) drums to an approved incinerator. In such event, Material Handling Department will make arrangements with the incinerator. Transport will follow state or Interstate highways wherever possible.

Traffic Control Signals

No applicable.

SECTION C

WASTE CHARACTERISTICS
AND WASTE ANALYSIS

Section C

Waste Characteristics

C-1 Chemical and Physical Analysis

Hazardous wastes are stored at this facility in 55-gallon drum containers. Maximum inventory consists of 50 drums of various clean-up solvents. No more than fifty drums shall be stored at any time. Specific waste products may vary with shipyard operations. In the event it becomes necessary to store other hazardous wastes, U. S. EPA and Wisconsin DNR will be notified.

The waste is generated primarily from paint and fiberglass equipment clean-up operations. The solvent used for the paint clean-up is delivered as a blend of Toluene, Butyl Acetate and Cellosolve Acetate. For fiberglass clean-up, Acetone, Methyl Ethyl Ketone and/or Methylene Chloride is used. This material is received as a recycled material blended solvent. Tables 1, 2 and 3 are analyses of the wastes generated by these clean-up operations.

Waste handling: All wastes are labelled; the label describes the contents of each container and its associated hazard. This practice informs workers handling these wastes of the associated hazards so that appropriate precautions can be taken.

AINT SOLVENT WASTE ANALYSIS

PETERSON BUILDERS, INC.

6 Bottle Composite Paint Waste

% Solids	12.6
Flash Point °F. (closed cup)	42
pH	8.1
Specific Weight gm/cc	0.89
% Suspended Solids	0.87
% Chloride	0.1
% Sulfur	0.1
% Ash	0.93

Organic Components:	Toluene	50%
	Butyl Acetate	25%
	Cellosolve Acetate	12%

Silver	ppm	0.1
Arsenic	ppm	0.2
Barium	ppm	5
Cadmium	ppm	0.1
Chromium	ppm	26
Copper	ppm	10
lead	ppm	58
Mercury	ppm	0.1
Nickel	ppm	2.1
Selenium	ppm	0.1
Zinc	ppm	551
Cyanide, Total	ppm	0.2

% Sulfide	0.05
% Sulfide	0.05
% Bisulfite	0.05

All results are expressed on a total wet weight basis.

Method: EPA, "Testing Methods for Evaluating Solid Waste", May, 1980.

Table 1

Donohue

INITIAL ANALYSIS REQUIRED FOR GENERATOR'S WASTE
MATERIAL PROFILE SHEET FOR
WASTE MANAGEMENT OF WISCONSIN,
CONTROLLED WASTE DIVISION

Client: Peterson Builders, Inc.

Waste Identification: Acetone

Lab Number: 10261

Sample Received in Lab: 01/10/84

Sampling Information: Submitted by Client

Total Solids (percent) 0.55

Dissolved Solids (percent) 0.13

Specific Gravity (g/cubic cm) 0.78

pH 6.95

Acidity if pH \leq 4 (to pH 8.2 mg/l as CaCO_3) Not Required

Alkalinity if pH \geq 10 (to pH 4.5 mg/l as CaCO_3) Not Required

Flash Point ($^{\circ}\text{F}$) \leq 57

Silver (mg/l) < 0.01

Arsenic (mg/l) 0.001

Barium (mg/l) 6.20

Cadmium (mg/l) 0.02

Chromium (mg/l) < 0.05

Hexavalent Chromium (mg/l) Unable to analyze
due to interference

Copper (mg/l) < 0.05

Mercury (mg/l) 0.0006

Nickel (mg/l) 1.04

Lead (mg/l) 0.34

Selenium (mg/l) 0.004

Zinc (mg/l) 0.39

Total Cyanide (mg/l) 0.73

Free Cyanide (mg/l) 0.64

Sulfide (mg/l) 4.3

Sulfite (includes Bisulfite, mg/l) < 16

Phenol (mg/l)

Physical Description

Bilayered _____

Multilayered _____ Not layered X

Physical State at 70 $^{\circ}$ F

Solid _____

Semi-Solid _____ Liquid X

Powder _____

Other: _____

Color

Odor

Brown/Orange

Acetone

Donohue Analytical, Inc.
4738 North 40th Street
Sheboygan, Wisconsin 53081
Analytical & Field Services
414-458-8711

Manager

Project Manager

Date

Donohue

METHYL ETHYL KETONE
FIBERGLASS SOLVENT
WASTE ANALYSIS

NOT PRESENTLY IN USE

METHYENE CHLORIDE
FIBERGLASS SOLVENT
WASTE ANALYSIS

NOT PRESENTLY IN USE

Details regarding the container storage area and personnel training are presented in other sections of this application. General information and hazardous characteristics of the waste are included in Appendix A. If shipbuilding operations require the storage of other wastes, additions shall be made to Appendix A.

C-2 Waste Analysis Plan

C-2a Parameters

Table 1 shows the hazardous wastes stored at the facility, and the analytical parameters that apply to each.

C-2b Test methods

Paint waste has been tested by distillation and gas chromatographic analysis with TCD detectors. Parameters were chosen on the basis of product data information sheets, to assess cost of incineration, and to identify EPA listed chemicals.

Other wastes are sent to Donahue Engineering in Sheboygan. Donahue is instructed to analyze wastes in accordance with EPA/DNR regulations and maintain records of the procedures used.

C-2c Sampling methods

Six drums of paint clean-up waste were randomly selected and sampled using a coliwasa sampler. These 6 samples were combined into one sample for analysis. Analysis is conducted by private laboratories. Product safety data sheets should accompany samples. Purchase Orders should require tests conform to EPA standards.

Since fiberglass clean-up wastes are generated in small quantities, the sample was drawn from a single drum.

materials change significantly or there is other reason to believe the waste characteristics have changed. These analyses will be conducted at the discretion of the plant engineer or the regulatory agency.

C-2e Additional requirements for wastes generated off-site

Although this facility handles off-site generated wastes, these wastes are generated only at PBI facilities in close proximity to the storage facility. No wastes are accepted from off-site facilities which are either not owned or not operated by PBI. Responsibility for analysis and labelling at the generating facility is taken by the same persons who will be responsible for storage at the storage facility. Accurate test records and labelling at the generating facility render testing by the storage facility unnecessary.

Date: 1/20/83
Revision: 1

SECTION D

PROCESS INFORMATION

C-2c Sampling Methods

Six (6) drums of particular waste are randomly selected and sampled using a coliwasa sampler. (In some cases, notably Di-Octyl Phthalate, generated quantities require that a single barrel be used). These six (6) samples are combined into one sample for analysis. Analysis is conducted by private laboratories. Product safety data sheets should accompany samples. Purchase Orders should require tests conform to EPA standards.

Since fiberglass clean-up wastes are generated in small quantities, the sample is drawn from a single drum.

C-2d Frequency of Analysis

Because the waste usually generated at this facility does not change significantly, re-analysis will only be done if raw materials change significantly or there is other reason to believe the waste characteristics have changed. These analysis will be conducted at the discretion of the plant engineer or the regulatory agency.

C-2e Additional Requirements for Wastes Generated Off-Site

Although this facility handles off-site generated wastes, these wastes are generated only at PBI facilities in close proximity to the storage facility. No wastes are accepted from off-site facilities which are either not owned or not operated

by PBI. Responsibility for analysis and labelling at the generating facility is taken by the same persons who will be responsible for storage at the storage facility. Accurate test records and labelling at the generating facility render testing by the storage facility unnecessary.

PAINT SOLVENT WASTE ANALYSIS -- TOLUENE BASE

PETERSON BUILDERS, INC.

6 Bottle Composite Paint Waste

% Solids	12.6
Flash Point °F (closed cup)	42
pH	8.1
Specific Weight gm/cc	0.89
% Suspended Solids	0.87
% Chloride	0.1
% Sulfur	0.1
% Ash	0.93

Organic Components:	Toluene	50%
	Butyl Acetate	25%
	Cellosolve Acetate	12%

Silver	ppm	0.1
Arsenic	ppm	0.2
Barium	ppm	5
Cadmium	ppm	0.1
Chromium	ppm	26
Copper	ppm	10
lead	ppm	58
Mercury	ppm	0.1
Nickel	ppm	2.1
Selenium	ppm	0.1
Zinc	ppm	551
Cyanide, Total	ppm	0.2
% Sulfide		0.05
% Sulfide		0.05
% Bisulfite		0.05

All results are expressed on a total wet weight basis.

Method: EPA, "Testing Methods for Evaluating Solid Waste", May, 1980.

Table 1

DOLORE

INITIAL ANALYSIS REQUIRED FOR GENERATOR'S WASTE
MATERIAL PROFILE SHEET FOR
WASTE MANAGEMENT OF WISCONSIN,
CONTROLLED WASTE DIVISION

Client: Peterson Builders, Inc.

Waste Identification: Acetone

Lab Number: 10261

Sample Received in Lab: 01/10/84

Sampling Information: Submitted by Client

Total Solids (percent) 0.55

Dissolved Solids (percent) 0.13

Specific Gravity (g/cubic cm) 0.78

pH 6.95

Acidity if pH \leq 4 (to pH 8.2 mg/l as CaCO_3) Not Required

Alkalinity if pH \geq 10 (to pH 4.5 mg/l as CaCO_3) Not Required

Flash Point ($^{\circ}\text{F}$) \leq 57

Silver (mg/l) < 0.01

Arsenic (mg/l) 0.001

Barium (mg/l) 6.20

Cadmium (mg/l) 0.02

Chromium (mg/l) < 0.05

Hexavalent Chromium (mg/l) Unable to analyze due to interference

Copper (mg/l) < 0.05

Mercury (mg/l) 0.0006

Nickel (mg/l) 1.04

Lead (mg/l) 0.34

Selenium (mg/l) 0.004

Zinc (mg/l) 0.39

Total Cyanide (mg/l) 0.73

Free Cyanide (mg/l) 0.64

Sulfide (mg/l) 4.3

Sulfite (includes Bisulfite, mg/l) < 16

Phenol (mg/l)

Physical Description

Bilayered ☐

Multilayered ☐

Not layered ☒

Physical State at 70 $^{\circ}$ F

Solid ☐

Semi-Solid ☐

Liquid ☒

Powder ☐

Other: ☐

Color

Brown/Orange

Odor

Acetone

Donohue Analytical, Inc.
4738 North 40th Street
Sheboygan, Wisconsin 53081
Analytical & Field Services
414-458-8711

Manager

Project Manager

C-8

Rev. 3

Date

2/15/84

INITIAL ANALYSIS REQUIRED FOR GENERATOR'S WASTE MATERIAL PROFILE SHEET FOR WASTE MANAGEMENT OF WISCONSIN, CONTROLLED WASTE DIVISION

Client: Peterson Builders, Inc.

Waste Identification: Methylene Chloride

Lab Number: 10262

Sample Received in Lab: 01/10/84

Sampling Information: Submitted by Client

Total Solids (percent) 9.53

Dissolved Solids (percent) Unable to analyze (dissolves filter)

Specific Gravity (g/cubic cm) 1.23

pH 7.02

Acidity if pH \leq 4 (to pH 8.2 mg/l as CaCO_3) Not Required

Alkalinity if pH \geq 10 (to pH 4.5 mg/l as CaCO_3) Not Required

Flash Point ($^{\circ}\text{F}$) 185

Silver (mg/l) <0.01

Arsenic (mg/l) 0.01

Barium (mg/l) 5.04

Cadmium (mg/l) 0.01

Chromium (mg/l) 0.81

Hexavalent Chromium (mg/l) Unable to analyze due to interference

Copper (mg/l) 0.120

Mercury (mg/l) 0.0044

Nickel (mg/l) 0.110

Lead (mg/l) 0.32

Selenium (mg/l) 0.026

Zinc (mg/l) 0.22

Total Cyanide (mg/l) 0.80

Free Cyanide (mg/l) 0.58

Sulfide (mg/l) Unable to analyze due to interference

Sulfite (includes Bisulfite, mg/l) <25

Phenol (mg/l) 21

Physical Description

Bilayered ☐

Multilayered ☐

Not layered ☒

Physical State at 70 $^{\circ}$ F

Solid ☐

Semi-Solid ☐

Liquid ☒

Powder ☐

Other: ☐

Color

Clear

Odor

Solvent

Donohue Analytical, Inc.
4738 North 40th Street
Sheboygan, Wisconsin 53081
Analytical & Field Services
414-458-8711

James C. Briel/pu
Manager

Pam Markelz
Project Manager

2/15/84
Date

METHYL ETHYL KETONE
FIBERGLASS SOLVENT
WASTE ANALYSIS

NOT PRESENTLY IN USE

11/28/84

LABORATORY REPORT

PAGE 4

CBC-AquaSearch

ENVIRONMENTAL SERVICES:
Analytical, Field & Consulting
 Air
 Water & Wastewater
 Solid & Hazardous Waste
 Industrial Hygiene

P240 8400738

PETERSON BUILDERS INC.
 101 PENNSYLVANIA PO BOX 47
 STURGEON BAY , WI 54235
 ATTN: JOHN BEALS

SAMPLE 84324-P04904 F508 7-24-84
 DATE COLLECTED 11/15/84 DATE RECEIVED 11/19/84

TEST NAME	RESULT	UNITS	EP TOXICITY	EP LIMIT	HAZ. CODE
CADMIUM - TOTAL	0.18	PPM			
CHROMIUM - TOTAL	340	PPM			
COPPER - TOTAL	1.8	PPM			
LEAD - TOTAL	780	PPM			
NICKEL - TOTAL	0.35	PPM			
ZINC - TOTAL	530	PPM			
BARIUM - TOTAL	9.8	PPM			
IRON - TOTAL	17	PPM			
ARSENIC - TOTAL	0.027	PPM			
SELENIUM - TOTAL	<0.010	PPM			
MERCURY - TOTAL	<0.0020	PPM			
PH (UNITS)	7.4				
TOTAL CYANIDE	1.0	PPM			
FLASH POINT (FAHRENHEIT)	= 60	DEG. F			
SPECIFIC GRAVITY	0.909	G/ML			
BTU'S	16000	BTU'S/LB			
% SULFUR	<0.01	%			
% CHLORINE	<0.03	%			
% MOISTURE	0.35	%			
TOTAL SOLIDS	10	%			
ASH CONTENT	1.1	%			

SAMPLE 84324-P04905 F555 9-4-84
 DATE COLLECTED 11/15/84 DATE RECEIVED 11/19/84

TEST NAME	RESULT	UNITS	EP TOXICITY	EP LIMIT	HAZ. CODE
-----------	--------	-------	-------------	----------	-----------

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
 TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS,
 1982, EPA SW846.
 ANNUAL BOOKS OF ASTM STANDARDS, 1982.

DATE

LABORATORY SUPERVISOR

DIVISION OF CHEM-BIO CORPORATION

140 EAST RYAN ROAD OAK CREEK, WISCONSIN 53154-4599

(414) 764-7005

C-11

1/28/85

LABORATORY REPORT

PAGE 1

CBC-AquaSearch

ENVIRONMENTAL SERVICES:
Analytical, Field & Consulting
 Air
 Water & Wastewater
 Solid & Hazardous Waste
 Industrial Hygiene

P240 8401138 KEW

PETERSON BUILDERS INC.
 101 PENNSYLVANIA PO BOX 47
 STURGEON BAY, WI 54235
 ATTN: JOHN BEALES

SAMPLE 85014-P04901 STILL BOTTOM PAINT WASTE
 DATE COLLECTED 1/08/85 DATE RECEIVED 1/14/85

TEST NAME	RESULT	UNITS	EP TOXICITY	EP LIMIT	HAZ. CODE
PCB (IF OIL OR COOLANT)	3	PPM			
AROCHELOR 1242					
BARIUM - TOTAL	350	PPM	2.0	MG/L	100.0
CADMIUM - TOTAL	2.6	PPM	0.048	MG/L	1.0
CHROMIUM - TOTAL	63	PPM	<0.05	MG/L	5.0
HEXAVALENT CHROMIUM - TOTAL	1.3	PPM			5.0
COPPER - TOTAL	61	PPM			
LEAD - TOTAL	110	PPM	0.23	MG/L	5.0
NICKEL - TOTAL	1.5	PPM			
SILVER - TOTAL	0.10	PPM			5.0
ZINC - TOTAL	470	PPM			
ARSENIC - TOTAL	0.006	PPM			5.0
SELENIUM - TOTAL	<0.01	PPM			1.0
MERCURY - TOTAL	<0.002	PPM			0.2
COLOR	FAN - VARIABLE				
LAYERS	NONE				
ODOR	SOLVENT				
PHYSICAL CHARACTERISTICS	SOLID				
FLASH POINT (FAHRENHEIT)	= 80	DEG. F			140.0
PH (UNITS)	7.2				2.0-12.5
SPECIFIC GRAVITY	0.91	G/ML			
TOTAL SOLIDS	65	%			
PHENOL	41	PPM			
SULFIDE	<0.1	PPM			
TOTAL CYANIDE	3	PPM			

STANDARD METHODS FOR THE EXAMINATION OF WATER AND WASTEWATER,
 15TH EDITION, 1980.

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.

TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS,
 1982, EPA SW846.

METHODS 601-612, FEDERAL REGISTER, VOL. 44, NO. 233.

4/29/85
DATE

LABORATORY SUPERVISOR

DIVISION OF CHEM-BIO CORPORATION

140 EAST RYAN ROAD OAK CREEK, WISCONSIN 53154-4599

(414) 764-7005

C-12

Donohue

Peterson Builders, Inc.
101 Pennsylvania Avenue
Sturgeon Bay, WI 54235

Attn: Mr. John Beales

Project Number: 63232.290

Received in Lab: 07/03/84

Collection Data: Submitted
by Client

Lab Number: 14968
Sample Date: 07/03/84
Sample Identification: Di-N-Octylphthalate

Aluminum (mg/l)	12.5
Barium (mg/l)	835
Cadmium (mg/l)	0.89
Total Chromium (mg/l)	<1
Copper (mg/l)	4.86
Iron (mg/l)	23.5
Lead (mg/l)	3.69
Mercury (mg/l)	0.15
Selenium (mg/l)	0.11
Silver (mg/l)	0.01
Zinc (mg/l)	46.3
pH (units)	4.18
PCB 1242 (mg/l)	<1
Total Cyanide (mg/l)	3.84
Flashpoint (°F)	No flash, No boil
Specific Gravity (g/cm)	1.01
Btu/lb	13,600
Ash Content (percent)	0.29
Total Halogen (mg/kg)	2,200
Water Content (percent)	3.3
Total Sulfur (ppm)	230
Physical Description	Bilayered liquid, milky white and clear, strong organic odor

Analyses performed in accordance with procedures approved by the U.S. Environmental Protection Agency

Donohue Analytical, Inc.
4738 North 40th Street
Sheboygan, Wisconsin 53081
Analytical & Field Services
414-458-8711

Pam Markelz / PCB
Pamela B. Markelz, Operations Manager

8/2/84
Date

Section D

Process Information

D-1 Containers

D-1a Containers

The maximum inventory of drums in storage at any given time during the operating life of the facility is not expected to exceed 50 drums. The container storage area, which is located in the Seville flammable liquid storage building, is located at 107 E. Walnut, Sturgeon Bay, WI. Drummed wastes are primarily waste solvents used in painting operation clean-up.

The storage building is constructed of steel with a concrete steel reinforced floor. A floor plan of the building is provided in Drawing 2.

D-1a(1) Description of containers

Steel 55-gallon drums are used at the facility to store the waste listed above in D-1a. The drums are constructed of low carbon steel that meets U.S. Department of Transportation specification Number 17E.

Date: 1/20/83

Revision: 1

D-2

DRAWING # 2

D-1a(2) Container management practices

Prior to transfer to the container storage building, wastes generated in the process areas are placed in the proper drums, sealed, and labeled according to Department of Transportation regulations for hazardous materials. Transfer of drums to the container storage area is performed by truck as outlined in the facility traffic discussion in Section B. A drum handler is used to load and unload containers onto the truck for transport to the facility and off of the truck once it reaches the storage building. At the storage building there are no sources of ignition such as open flames.

Primary aisle space of at least 3 feet is maintained at all times and the container storage area is inspected regularly (See Section F-2).

D-1a(3) Secondary containment system design and operation

The container storage area pad is constructed of concrete, designed for loads of 250 lb/in square. A 6 inch high concrete curb lines the perimeter of the storage area to provide a holding capacity of 3366 gallons, or more than 31% of the total volume held by the estimated maximum inventory, and sixty-one times the volume of the largest container.

Date: 1/20/83

Revision: 1

D

Containment volume calculation: 1000 sq. ft. - 100 sq. ft. (ramp areas)

= 900 sq. ft.

900 sq. ft. x .5 ft. (curb height)

= 450 cubic ft.

1 cubic ft. = 7.48 gal.

450 cubic ft. x 7.48 gal/cubic ft.

= 3366 gal.

The concrete pad is presently in good condition, free of any gaps, holes, or cracks.

The pad will be regularly inspected as discussed in Section F-2 to insure that it remains impervious and in good condition. Because the facility is located indoors, rainwater collection sumps are not necessary.

Run-on is prevented from entering the containment area by several means. Besides the presence of a 6 inch curb at the perimeter of the storage area in the building, the walls of the building also prevent run-on to the area.

The doors on the storage building are lockable and 24 hour surveillance is provided at the facility.

D-1a(4) Removal of liquid from containment area

In the unlikely event that a drum of material leaks or liquid collects in the containment structure, this material will be cleaned up as outlined in the emergency response procedures section of the contingency plan in Section G.

D-1b Containers without free liquids

The Peterson Builders, Inc. storage facility does not currently manage containers without free liquids. Therefore, permit application sections D-1b, D-1b(1), D-1b(2), D-1b(3), and D-1b(4) are not applicable.

D-2 Tanks

Presently Peterson Builders does not manage storage tanks, therefore, Section D-2 is not applicable.

D-3 Waste Piles

Presently Peterson Builders does not manage wastes in piles, therefore, Section D-3 is not applicable.

D-4 Surface Impoundments

Presently Peterson Builders does not manage wastes in surface impoundments, therefore, Section D-4 is not applicable.

Date: 1/20/83

Revision: 1

D

D-5 Incinerators

Presently Peterson Builders does not manage an incinerator, therefore, Section D-5 is not applicable.

Date: 1/20/83
Revision: 1

SECTION E

GROUNDWATER MONITORING SYSTEMS

Date: 1/20/83

Revision: 1

E

SECTION E

GROUNDWATER MONITORING SYSTEMS

The requirements for groundwater monitoring are not applicable to a storage facility such as Peterson Builders, Incorporated which stores containers of waste.

Date: 1/20/83
Revision: 1

SECTION F

PROCEDURES TO PREVENT HAZARDS

SECTION F

PROCEDURES TO PREVENT HAZARDS

F-1 Security

F-1a Security procedures and equipment

In addition to the general security provided by the locked doors of the storage building, other features contribute to the safety and security of the facility. Lighting is provided on all four sides of the facility. An internal telephone system is provided.

F-1a(1) 24-hour surveillance system

The building is under 24-hour surveillance by the Sturgeon Bay Police Department.

F-1a(2) Barrier and means to control entry

F-1a(2)(a) Means to control entry

The doors of the storage building are locked when it is not occupied.

F-1a(3) Warning signs

Signs which are legible from a distance of 25 feet are posted at all entrances to the facility. These signs are visible from all angles of approach and bare the legend "Danger - Unauthorized Personnel Keep Out". Also, "No Smoking" signs are legible for a distance of 25 feet and have been placed in the container storage area.

F-1b Waiver

Peterson Builders, Inc. does not request a waiver of the requirements stated in Part 264.14(a)(1) and (2) regarding injury to intruder and violation by intruder.

F-2 Inspection Schedule

F-2a General inspection requirements

Peterson Builders Incorporated conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous constituents and adversely affect the environment or threaten human health.

F-2a(1) Types of problems

Table 2 represents the schedule for inspecting monitoring equipment, safety and emergency equipment, security devices,

Date: 1/20/85
Revision: 1

PETERSON INSPECTION SCHEDULE

Area/equipment	Specific item	Types of problems	frequency of inspection
Operating and structural equipment	Bases or foundation	Erosion; uneven settlement; cracks and spalling in concrete pads, base rings and piers; deterioration of water seal between tank bottom and foundation, wet spots	Weekly
	Base or Foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
	Debris and refuse	aesthetics, possible reaction with leaks	Weekly
	Pallets	Damaged (e.g., broken wood, warping, nails missing)	Weekly
Container Storage Area	Segregation of incompatible wastes	Storage of incompatible wastes in area	Weekly
	Container placement	Aisle space	Weekly
	Sealing of containers	Open lids	Weekly
	Labeling of containers	Improper identification, date missing	Weekly
Emergency Response Equipment	Containers	Corrosion, leakage, structural defects	Weekly
	Ramps	Cracks, spalling, uneven settlement, erosion	Weekly
	Warning signs	Damaged	Weekly
	Protective clothing, absorbants, overpack drums, etc.	Contents in order and usable	Monthly

operating and structural equipment, and the container storage area. The items listed in the table are considered because of their role in preventing, detecting, or responding to environmental or human health hazards. Provided with each item is a list of problems normally encountered.

F-2a(2) Frequency of inspection

Also provided in Table 2 is a recommended frequency of inspection for each item.

F-2b Specific process inspection requirements

F-2b(1) Container inspection

Inspections of the container storage area will be conducted per the inspection schedule provided in Table 2. Results of each inspection will be recorded on inspection log sheets entitled "Operating and structural equipment inspection log sheet", "Security devices inspection log sheet" and "Container storage area inspection log sheet" (Appendix B). Information requested on the log sheets includes the inspector's name and title, date and time of inspection, item of inspection, typical problems encountered, status of the item, observations, and the date and nature of repairs of remedial action. Typical problems encountered with each item of inspection, included in the inspection

schedule, are provided on the log sheet to serve as a reminder to the inspector and to insure a complete inspection. The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. Special attention is given to the number of containers, aisle space, and more. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action.

F-2(c) Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time in between inspections, remedial action will be taken immediately. PBI personnel will notify the appropriate authorities per the contingency plan (See Section G) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the contingency plan for further details.

F-2(d) Inspection Log

An inspection log is maintained for each calendar year in a three ring binder. After an inspection, the log sheets are filed in the binder which provides a case history of a particular item. The inspection log book is always kept with the inspection schedule in the storage building. As required, records of inspections are kept for at least 3 years from the date of inspection.

F-3 Waiver of preparedness and prevention requirements

PBI does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR Part 264, Subpart C. Requirements of this part are primarily addressed in Section D, Section F, and Section G of this application.

F-3a Equipment requirements

Internal and external communications, emergency equipment, and fire control equipment are discussed in Section F and Section G.

F-3b Aisle space requirements

Aisle space requirements are addressed in Section D-1a(2).

F-4 Preventative procedures, structures, and equipment

F-4a Loading/unloading operations

Loading and unloading operations at the facility take place at the facility loading dock. During loading operations spills are unlikely, however, in the event of an accident the material will be contained with standard industrial absorbants, absorbant boom and pads, or dirt. Contaminated materials will be hauled to a permitted hazardous waste landfill, and affected areas of the facility and equipment will be decontaminated.

Several precautions have been taken to reduce the potential of hazards during unloading operations in the container storage area.

1. ramps
2. aisle space

F-4b Runoff

Runoff is not generated inside the storage building.

F-4c Water supplies

Groundwater contamination is prevented by eliminating the discharge of hazardous waste onto the unprotected ground. The container storage area is constructed of a concrete base, with dikes, designed to contain leaks and spills.

F-4d Equipment and power failure

The facility will be monitored for any unusual activity during periods of power failure.

F-4e Personnel protection equipment

General information on the major chemical components of the wastes in the container storage area is provided in Appendix A. The sheets present information on various chemicals regarding toxicity, fire and explosion hazards, protective equipment recommendations, and first aid. Available protective equipment is presented under Emergency Equipment and Provisions of the Contingency Plan (See Section G). Use of protection is covered in the initial and annual personnel training programs.

F-5 Prevention of reaction of ignitable, reactive, and incompatible wastes

F-5a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes

No reactive wastes are stored at the facility. The containers, as discussed in Section D-1a(1), are compatible with the contained wastes; therefore, the only source of ignition is external to the containers. To prevent a possible source of external ignition, signs are placed in the

container storage area clearly marked with the legends, "No Smoking" and "Danger - Unauthorized Personnel Keep Out." Sparkproof tools (brass hammers, wrenches, etc.) are used on all containers storing ignitable materials.

F-5b General Precautions for Handling Ignitable or Reactive Wastes or Accidentally Mixing Incompatible Wastes

General precautions for handling ignitable or reactive wastes were discussed above. Incompatible wastes are not mixed at the PBI storage facility.

F-5c Management of Ignitable or Reactive Wastes in Containers.

Precautions taken in the container storage area to prevent accidental fire and explosion include the proper storage of containers (e.g. aisle space, labeling and sealing of containers), dikes, and appropriate warning signs.

Prior to storage, each container is sealed and labeled. This identifies the contents of the container and the date wastes were generated. Containers are never stacked. A minimum of 3ft is maintained in the aisles to allow access for a drum handler without risk of damaging containers by scraping or puncturing.

F-5d Management of Incompatible Wastes in Containers

No incompatible wastes are stored at this facility.

SECTION G

CONTINGENCY PLAN

CONTINGENCY PLAN
TABLE OF CONTENTS

SECTION I - PRELIMINARY RESPONSE

INTENT OF PLAN	G I-1
OVERVIEW	G I-1
EQUIPMENT AND ALARMS	G I-2
EMERGENCY RESPONSE	G I-3

SECTION II - EMERGENCY SQUAD

FIRE AND RESCUE SQUAD	G II-1
IMPLEMENTATION OF PLAN	G II-1
EMERGENCY RESPONSE PROCEDURES	G II-3
IDENTIFICATION OF WASTES	G II-4
FIRE OR EXPLOSION	G II-4
SPIILLS	G II-7
POST EMERGENCY PROCEDURES	G II-14

PETERSON BUILDERS, INCORPORATED
HAZARDOUS WASTE STORAGE
CONTINGENCY PLAN

I-A. Intent of Plan

The intent of this plan is to provide the employees of Peterson Builders, Inc., with an outline of actions to be taken in the event of a fire or a spill of hazardous wastes.

Familiarity with this plan should help you to take the proper actions in the event of a spill or fire. Safety in handling hazardous wastes, common sense, and the use of proper tools to prevent fires and spills will always be the best plan. Knowledge of this plan and safety will help guard your health and help keep Door County a good place to live.

This plan has two parts. Part I is designed to be used by the people handling hazardous wastes or working at the paint warehouse. Part II is designed as a guide for the Rescue and Emergency Squad.

I-B. Hazardous Waste Operations Overview

This plan applies to the Peterson Builders, Inc., (PBI) paint warehouse located at 107 E. Walnut Street, Sturgeon Bay, WI 54235. PBI builds and repairs ships. Part of that process involves painting. The solvents used to clean paint brushes, paint sprayers and fiberglassing tools become hazardous wastes. PBI requires special care and handling of those wastes to avoid injury or pollution.

There are two special hazards involved. The solvents are flammable. Special care must be taken to avoid any source of ignition. The solvents would poison ground water if released in large quantities. Spills must be prevented.

To avoid the possibility of ground water contamination, PBI tracks the solvents to their final destination. Solvents are collected in specially labelled and numbered barrels. Records are kept on each barrel as it moves from the shipyard to the storage warehouse to the original supplier. The original supplier arranges to have the solvents recycled. PBI has them recycled to avoid creating dumps or polluting the air through burning.

I-C. Firefighting Equipment, Spill Cleanup Equipment and Alarms

1. Firefighting Equipment

- a. A B-II dry chemical fire extinguisher is located near the warehouse door.
- b. Two Mine Safety Respirators with spare cartridges, hard hats and spray shields are in the safety locker.
- c. A portable first aid kit is in the safety locker.

2. Spill Equipment

- a. A 150 foot roll of 3M Sorbent and two 50 pound bags of sorbent are next to the safety locker. Sorbent can be used to dam or soak up spills.
- b. Respirators, spare cartridges, 2 pair of rubber gloves and boots, hard hats, spray shields and disposable coveralls are in the safety locker.
- c. Over size drums (at least three) are next to the safety locker. Over size drums can be placed around leaking drums.
- d. Two five gallon/minute hand pumps are next to the safety locker. Hand pumps can be used for emptying drums or pumping out contained spills.

- e. For large contained spills, 35 gpm Jabsco pumps are available at the paint shop and maintenance shop. Jabsco pumps take suction through a normal garden hose. Impellers are rubber and explosion proof. Mount the pump motor outside of the area and lead hoses from the spill and to the recovery drum.

3. Alarms

- a. A telephone is mounted above the supervisor's desk. Dial 333 to report an emergency.
- b. A warehouse alarm is located above the supervisor's desk. It is activated by a light switch.

I-D. Emergency Response

In case of a spill or fire, the first action taken must be to notify the PBI Fire and Rescue Squad. If you are alone, don't try to fight the fire, GET HELP.

There is a telephone located on the warehouse supervisor's desk. To get help, dial 333. The operator will notify the Fire and Rescue Squad and the Sturgeon Bay Fire Department. The Fire and Rescue Squad has people specially trained in fighting fires and spills.

Your next action should be to sound the warehouse fire and evacuation alarm. The alarm is sounded by flipping a switch. The switch is mounted above the right-hand side of the supervisor's desk.

Once the proper notifications have been made, the Fire and Rescue Squad will take full charge of the situation. Persons who are not on the Fire and Rescue Squad should take actions as directed by the Squad leader.

INTRODUCTION

The intent of this contingency plan is to provide Peterson Builders, Inc. with a systematic format for responding to any emergency situations which may arise in association with the hazardous waste storage facility.

This contingency plan has been developed to meet the requirements of Part 264 Subpart D (Contingency plan and emergency procedures) of the Federal Hazardous Waste regulations.

This contingency plan is for Peterson Builders, Inc. located at 107 E. Walnut, Sturgeon Bay, WI 54235. Peterson is primarily a shipbuilder generating hazardous waste which must be stored off site for up to 90 days prior to transport to another hazardous waste facility. This contingency plan is being developed for the storage area where wastes are stored prior to shipment.

PBI stores hazardous waste in their flammable liquid storage building. The building is metal and the hazardous waste storage area in this building is designed to store approximately 50 drums. The characteristics of the waste material being stored here are those of a flammable liquid. Specifically, the waste is generated in a painting equipment clean-up operation. The major component of the waste is toluol. The materials are stored in 55-gallon DOT specification drums.

Emergency Coordinators

If any emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed below.

EMERGENCY COORDINATORS

Primary	Orville Gauger
	463 N. 7th Ave.
	Sturgeon Bay, WI 54235
	Home phone (414) 743-2794
	Work phone: (414) 743-5577, ext. 376

Alternate Fred Peterson
4060 N. Bayshore Dr.
Sturgeon Bay, WI
Home phone: (414) 743-3261
Work phone: (414) 743-5577, ext. 205

Alternate Bruce Atkins
1113 N. 8th Ave.
Sturgeon Bay, WI
Home phone: (414) 743-9294
Work phone: (414) 743-5577, ext. 217

Implementation of the contingency plan

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the emergency coordinator in making this decision by providing decision making criteria.

The contingency plan will be implemented in the following situations:

1. Fire and/or explosion
 - A. A fire causing the release of toxic fumes.
 - B. The fire spreads and could possibly ignite materials at other locations on site or could cause heat induced explosions.
 - C. The fire could possibly spread to off site areas.

- D. Use of water or water and chemical fire suppressant could result in contaminated runoff.
 - E. An imminent danger exists that an explosion could occur causing a safety hazard because of flying fragments or shock waves.
 - F. An imminent danger exists that an explosion could ignite other hazardous waste at the facility.
 - G. An imminent danger exists that an explosion could result in release of toxic material.
 - H. An explosion has occurred.
2. Spills or material release
- A. The spill could result in release of flammable liquids or vapors thus causing a fire or gas explosion hazard.
 - B. The spill could cause the release of toxic liquids or fumes.
 - C. The spill can be contained on site, but the potential exists for groundwater contamination.
 - D. The spill cannot be contained on site, resulting in an off site soil contamination and/or ground or surface water pollution.

Emergency Response Procedures

A. Notification

In the event of an emergency situation, the emergency coordinator will be notified first; subsequently all facility personnel, appropriate federal, state or local

agencies and fire or police departments will also be notified.

Emergency Response Agency Contacts

Sturgeon Bay Fire Department	743-2121
Sturgeon Bay Police Department	743-2244
Sturgeon Bay Emergency medical team	743-2244
Wisconsin DNR emergency number	608-266-3232
National Emergency Response center	800-424-8802
U.S. Coast Guard MSO, Sturgeon Bay (if any spill could pollute water)	743-9448
Chem Trec	800-424-9300

B. Identification of hazardous wastes

The emergency coordinator will immediately identify the character, exact source, amount and area extent of the release. The initial identification method will be to utilize visual analysis of the material and location of the release. If for some reason the released material cannot be identified, samples will be taken for chemical analysis if possible.

C. Assessment

The emergency coordinator will assess possible hazards both direct and indirect to human health or the environment.

D. Control Procedures

Potential emergencies fall under two general classifications.

1. Fire and/or explosion
2. Spills or material releases

Natural disasters such as earthquakes or tornados are assumed to fall into these two classifications.

FIRE AND/OR EXPLOSION

The container storage area can be easily accessed by fire fighting and other emergency vehicles and equipment.

A company fire brigade will be on stand by during all general plant emergencies. During times of power failure or severe weather, fire protection personnel will be assigned to protect personnel and property. If a fire should break out, concentration will be placed on preventing the fire from spreading to nearby areas. The fire fighting effort will be carried out by the fire brigade until outside assistance has arrived.

The following actions will be taken in the areas affected by the fire or explosion.

1. Fire doors in buildings will be closed.
2. Work in all hazardous areas will be shut down immediately.

3. All feedlines and additional equipment will be shut down as necessary.
4. The emergency coordinator will be contacted.
5. The area will be cleared of all personnel not actively involved in fighting the fire. These persons are to report to the designated rally points for accountability. (See evacuation plan.)
6. All injured persons will be removed and medical treatment will be administered by qualified personnel.

Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition have been eliminated. The vehicular traffic and hazardous work in the area will cease until the spill is contained and safety is restored. If spilled materials are flammable, the fire brigade will respond with foam equipment and hoses. Flushing with large quantities of water or foaming of the spill will be performed only if advised by the fire brigade chief.

If substantial quantities of a highly flammable material is released (e.g. propane or natural gas), all persons within at least a quarter mile radius of the release will be notified. All ignition sources within this area will be eliminated. Use of motor vehicles within this area will be restricted or eliminated to avoid ignition of vapors which can cause a flashback to the source and initial explosion of fire of wide dimensions. If the chance of an impending explosion are high, the entire area within a 2000 foot radius of the source will be evacuated.

Fire fighting will not be done at the risk of injury to the persons involved; however, early containment of fires can significantly decrease total damage.

Area or plant evacuation will be necessary in case of major fire or explosion. Specifics are outlined under general evacuation procedures. All personnel have been trained in evacuation and means of exit from their respective work areas.

Until evacuation is signaled, personnel who are not in an effected area will stay in their respective work areas. Contract personnel and visitors will be cleared from the area and instructed to report to the rally point.

The fire brigade chief will be responsible for all fire fighting efforts until outside help arrives. Supervisors of unaffected areas will stay with their personnel and be ready to evacuate and account for the persons under their supervision. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The fire brigade chief will determine when the emergency has passed and consult with the emergency coordinator before the "all clear" signal is given. All emergency equipment used in the emergency must be cleaned and fit for use prior to resumption of plant operation in the affected areas.

SPILLS OR MATERIAL RELEASES

In the event of a major emergency involving a chemical spill the following general procedures will be used for rapid and safe response and control of the situation.

If an employee discovers a chemical spill or process upset resulting in vapor release, he or she will immediately report it to the area supervisor.

The area supervisor will contact the designated emergency coordinator at the time of the incident. When contacted, the designated emergency coordinator will obtain information pertaining to the following:

1. The material spilled or released.
2. Location of the release or spillage of hazardous material.
3. An estimate of quantity released and the rate at which it is being released.
4. The direction in which the spill or vapor or smoke release is heading.
5. Any injuries involved.
6. Fire and/or explosion or possibility of these events.
7. The area and materials involved and the intensity of the fire or explosion.

This information will help the emergency coordinator to assess the magnitude and potential seriousness of the spill or release. If the incident is determined to lie within the company's emergency response capabilities, the emergency coordinator will contact and deploy the necessary inplant personnel. If the accident is beyond plant capabilities, the emergency coordinator will contact the appropriate response agencies. (See list of emergency response agencies).

The initial response to any emergency will be to protect human health and safety and then the environment. Identification,

containment, treatment, and/or disposal assessment will be the secondary response.

If for some reason a chemical spill is not contained within a containment structure, i.e. dike, an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the material involved. If the spill is large and involves a tank or pipe line rupture, an initial isolation of at least 100 feet in all directions will be used. Small spills or leaks from a tank or pipe will require evacuation of at least 50 feet in all directions to allow cleanup and repair to prevent exposure. When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated area. If possible, the area will be roped or otherwise blocked off.

If the spill results in the formation of a toxic vapor cloud, (by reaction with surrounding materials or by outbreak of fire) (due to high vapor pressures under ambient conditions), further evacuation will be enforced. An area at least 500 feet wide and 1000 feet long will be evacuated downwind if volatile materials are spilled.

If the control and clean up of a spill, release, or fire is within the capabilities of company personnel and local response teams, the state and federal response agencies will not be notified unless one of the following occurs.

1. A spill discharges to a surface water and the quantity of hazardous material spilled is equal to or greater than the reportable quantity specified under 40 CFR part 117.

2. 1000 gallons or more of oil is spilled in a single event. If a lesser quantity has been spilled, but has entered a stormsewer leading to a surface water, it is advisable to contact local and state authorities for assistance if it is not possible to intercept the spill at the outfall or prevent the oil slick from moving down stream.
3. The spill involves other hazardous materials not listed but used at the plant if they pose an actual or potential hazard to life or property.

As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), PBI's practice is to report a spill of a pound or more of any hazardous material for which a reportable quantity has not been established and which is listed under the solid waste disposal act, clean air act, clean water act, or toxic substances control act. Peterson will also follow the same practice for any substance not listed in the acts noted above, but which can be classified as hazardous waste under RCRA.

If the emergency coordinator determines that the company is unable to handle the emergency, then local, state and federal authorities will be notified of the situation. Evacuation of all potentially affected areas will be initiated as soon as possible.

The following guidelines will be used in case of an accidental episode involving waste materials. These are general guidelines and circumstances may dictate some alterations to these procedures.

Most spills and leaks are easily contained within a small area. Small spills can be absorbed with an absorbant media such as oil dry, scooped up and then placed in 55 gallon drums. For all large spills and serious leaks, the following guidelines will be followed as closely as possible.

1. If a leak develops or a spill occurs from the waste storage area, tank, or pipe line, etc., the person discovering the discharge will leave the immediate area and contact either their supervisor or the emergency coordinator. The emergency coordinator will obtain the following information.
 - A. Person(s) injured and seriousness of injury.
 - B. Location of the spill or leak, material involved and source, drums, tank, pipe line, etc.
 - C. The approximate amount spilled, an estimate of the liquid or gas discharge rate, and the direction of the liquid flow or gaseous cloud movement.
 - D. Whether or not a fire is involved.
2. Next, the emergency coordinator will:
 - A. Initiate evacuation of the hazard area. For small spills or leaks, isolate at least 50 feet in all directions. For large spills initially isolate at least 100 feet in all directions and keep all persons upwind of spill.
 - B. Obtain medical attention for any injured persons. It may be helpful to instruct the caller in initial first aid procedures, then call the hospital.

- C. Call the fire department if a fire is involved that cannot be extinguished by plant personnel. Fight small fires with dry chemicals, CO₂ or foam and large fires with water spray, fog, or foam. Keep heat exposed containers cooled with water spray and remove them from the fire. IF A RISING SOUND COMES FROM A VENTING DEVICE OR THE DRUM BEGINS TO DISCOLOR, WITHDRAW FROM THE AREA IMMEDIATELY.
 - D. Dispatch emergency personnel to the site to take the appropriate action.
 - E. Contact the proper authorities if the spill or release is large. Contact local authorities first so that, if necessary, downstream water users and/or persons downwind of the vapor can be notified, and if necessary, evacuated. If a large spill occurs, the initial evacuation area downwind should be 1000 feet by 500 feet. If a waste container becomes involved in fire, isolate an area 1/2 mile in all directions.
3. Clean up personnel will:
- A. Make sure all unnecessary persons are removed from the hazard area.
 - B. Put on protective clothing and equipment.
 - C. If the flammable waste is involved, remove all ignition sources and use spark and explosion proof equipment and clothing in containment and clean up.

- D. If possible, try to stop the leak. Special materials will be kept on hand for temporary repairs, or over-pack drums will be used for this purpose.
- E. Remove all surrounding materials that could be especially reactive with materials in the waste. Determine the major components in the waste at the time of the spill.
- F. Use absorbant pads, booms, earth, sandbags, sand and other inert materials to contain, divert, and clean up a spill if it has not been contained by a dike. Most spills contained within the dike can be pumped back into an appropriate storage tank or drum.
- G. If wastes reach a storm sewer, try to dam the outfall by using sandbags, earth, or other material. If this is done, wastes in the storm sewers should be pumped out into a temporary holding tank or drums as soon as possible. If a spill enters the surface water, use absorbant booms and sweep around the outfall to contain and absorb water insoluble organics.
- H. Place all containment and clean up materials in drums for proper disposal. Some items such as absorbant rags or booms may have to be cut up.
- I. Place all recovered liquid waste and contaminated soil in drums for removal to an approved disposal site.
- J. Decontaminate all reusable spill containment material tools and equipment, i.e. protective suits, shovels, pails, etc.

Prevention of recurrence or spread of fires, explosions or releases

Actions to prevent the recurrence or spread of fires, explosions, or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating containers.

Storage and treatment of released material

Immediately after an emergency, the emergency coordinator will make arrangements for treatment, storage or disposal of recovered wastes, contaminated soil, surface water or other contaminated material.

Incompatible wastes

The emergency coordinator will insure that wastes which may be incompatible with the released material are not stored in the effected area until clean up procedures are completed.

Post emergency equipment maintenance

After an emergency event, all emergency equipment will be cleaned so that it is fit for use or it will be replaced. Before operations are resumed, an inspection of all safety equipment will be conducted.

Emergency response equipment list and location

The following equipment will be stored in the storage facility:

- 7 overpack recovery drums
- 2 DOT 17E 55 gal.
- 1 roll 36' X 150' 3M type 100 oil sorbant
- 2 - 50 lb. bags oil dry
- 1 - 4" diaphragm hand pump
- 2 tyreck coveralls
- 2 hard hats with splash shields
- 2 organic vapor respirators
- 1 box MSA organic vapor replacement cartridges
- 2 pair rubber gloves
- 1 drum chain
- 2 pair rubber boots
- 1 - 6' long diaphragm pump hose

Fire extinguishers are located throughout the building. The building is also equipped with extra hazard water sprinkler system.

First aid supplies are also available at the facility.

Familiarization and Agreements

Familiarization of local agencies with the nature and hazards of this facility shall be effected through distribution of the contingency plan.

Distribution of plan

1. Copies of the contingency plan have been given to the local police and fire departments, the hospital, and state and local response teams. These agencies were asked to review and comment on the plan and have detailed the actions they will take in response to any emergency. The following organizations have been sent copies of the contingency plan.

Sturgeon Bay Fire Department

Sturgeon Bay Police Department

Local hospital

Local emergency medical team

DNR district headquarters

DNR hazardous waste management section chief Madison

USCG Marine Safety Office, Sturgeon Bay

Evacuation plan

Due to the small size of the facility and the few persons at the facility at any one time, the evacuation plan will be limited to the following.

1. Alarm sounds alerting of emergency.
2. Personnel at the facility will respond as outlined in the contingency plan (Section G).
3. If evacuation of the building is required, personnel will use the closest available exit.
4. All persons will report to the rally point in front of the facility and await instruction for further action.

Required reports

As required by state and federal law, any emergency event (e.g. fire, explosion, etc.) that requires implementing the contingency plan will be reported in writing within 15 days to the EPA Regional Administrator. The reporting form for emergency events is shown in Figure 1.

DATE: 1/20/83
Revision No: 1
G

Reporting form for emergency events

Name, address and phone number of facility, operator or owner

Date, time and type of incident, e.g. fire, explosion, etc.

Name and quantity of material involved

Extent of injuries if any

Assessment of actual or potential hazards to human health or
environment if applicable

Estimated quantity and disposition of material recovered from the
incident

Amendments to the contingency plan

The contingency plan will be reviewed and immediately amended if necessary whenever

1. The plan fails in an emergency
2. The facility changes its design, construction, operation, maintenance or other circumstances in a way that materially increase the potential for fires, explosion or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary to an emergency.
3. The list of emergency coordinator changes.
4. The list of emergency equipment changes.

surface water, use absorbant brooms and sweep around the outfall to contain and absorb water insoluble organics.

- H. Place all containment and cleanup materials in drums for proper disposal. Some items such as absorbant rags or brooms may have to be cut up.
- I. Place all recovered liquid waste and contaminated soil in drums. The drums should be transported to the Storage Building at 107 East Walnut Street or the Paint Cleanup Building at 101 Pennsylvania. The Material Handling Department will arrange for proper disposal or incineration.
- J. Decontaminate all reusable spill contaminant material, tools and equipment, i.e. protective suits, shovels, pails, etc.

Prevention of Recurrence or Spread of Fires, Explosions or Releases

Actions to prevent the recurrence of spread of fires, explosions, or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating containers.

Storage and Treatment of Released Material

Immediately after an emergency, the Paint Foreman will make arrangements to have all cleanup and waste barrels moved to the West Side waste storage building.

Incompatible Wastes

The Fire and Rescue Squad will have any materials that are incompatible with the spilled wastes removed to a safe location until cleanup is completed.

Post Emergency Equipment Maintenance

After an emergency event, all emergency equipment will be cleaned so that it is fit for use or it will be replaced. Before operations are resumed, an inspection of all safety equipment will be conducted.

Familiarization and Agreements

Familiarization of local agencies with the nature and hazards of this facility shall be effected through distribution of the Contingency Plan. No special arrangements have been made.

Distribution of Plan

Copies of the Contingency Plan have been given to the local police and fire departments, the hospital, and state and local response teams. These agencies were asked to review and comment on the Plan. The following organizations have been sent copies of the Contingency Plan:

Sturgeon Bay Fire Department

Sturgeon Bay Police Department

Local Hospital

Local emergency medical team

DNR District Headquarters

DNR hazardous waste management section chief, Madison

USCG Marine Safety Office, Sturgeon Bay

U.S. EPA Region V, Chicago, IL

Evacuation Plan

Due to the small size of the facility and the few persons at the facility at any one time, the Evacuation Plan will be limited to the evacuation of the physically attached buildings. In case of fire or explosion, the response team shall coordinate evacuation. Each building is equipped with sufficient exists to facilitate orderly evacuation. Further evacuations shall be ordered at the sole discretion of the Fire and Rescue Squad leader.

II-I. Required Reports

As required by state and federal law, any emergency event (e.g. fire, explosion, etc.) that requires implementing the Contingency Plan will be reported in writing within fifteen (15) days to the EPA Regional Administrator. The reporting form for emergency events is shown in Figure 1.

II-J. Amendments to the Contingency Plan

The Contingency Plan will be reviewed and immediately amended if necessary whenever:

1. The plan fails in an emergency.
2. The facility changes its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosion or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary to an emergency.
3. The list of emergency coordinator changes.
4. The list of emergency equipment changes.

G-II-16

REPORTING FORM FOR EMERGENCY EVENTS

Name, address, and phone number of facility, operator or owner

Date, time and type of incident, e.g. fire, explosion, etc.

Name and quantity of material involved

Extent of injuries if any

Assessment of actual or potential hazards to human health or
environment if applicable

Estimated quantity and disposition of material recovered from
the incident

FIGURE 1

SECTION H

TRAINING PROGRAM

SECTION H
PERSONNEL TRAINING

H-1 Outline of Training Program

H-1a Job Titles and Duties

Less than 5 employees are normally involved with the storage facility: Maintenance personnel (i.e., electricians and mechanics) work in the waste handling area, but they do not handle wastes directly. The duties, responsibilities, and qualifications of each position follow:

Position Title: Industrial Engineer

Name of employee: Gary Higgins

Position Responsibilities and Duties:

- o Insure the training of plant personnel in the proper handling of raw materials, intermediates, finished products, and waste byproducts.
- o Obtains all required permits and licenses or modifications of same from local, state, and Federal regulatory bodies.
- o Resolves problems involving permits and licenses from local, state, and Federal regulatory agencies.
- o Drafts and submits to plant manager all required reports to EPA or the State.

Experience and Qualifications

- o Proven administrative ability and familiarity with EPA, DOT, and DNR hazardous waste and material regulations.

Position Title: Warehouse Supervisor

Name of employee: Gary Karnopp

Position Responsibilities and Duties:

- o Overall operation and maintenance of the hazardous waste storage facility.
- o Maintains facility compliance with RCRA and other permits.
- o Maintains operating log, monitoring records, maintenance records, inspection records, and all other required records.
- o Notifies supervisor, and if so directed, proper authorities in emergency situations.
- o Reports to Tom Kerley

Experience and Qualifications

- o Required to complete the hazardous waste transport course at the Northwest Technical Institute in Green Bay, WI.

APPLICABLE TO GENERATOR PROGRAM ONLY

Position Title: Painter

Name of Employee:

Position Requirements:

- o Fill drums to proper level with paint wash
- o Insure filled drums are in good condition and bungs are tight
- o Apply proper labels to drums
- o Respond to emergency situations.

Date: 1/20/83
Revisions No.: 1
H

Position Title: Driver

Name of Employee: Ken Doell & Charles Cihlar

Position Requirements:

- o Load and unload hazardous waste on truck
- o Insure manifest is complete and drums are properly labeled and in good condition.
- o Notify emergency coordinator and respond to transport emergencies.
- o Required to complete the hazardous waste transport course at the Northwest Technical Institute in Green Bay, WI

Date: 1/20/83
Revisions No.: 1
H

Position Title: Secretary

Name of Employee: Sandy Soik

Position Responsibilities:

- o Reports to Gary Higgins
- o Generating and follow up manifest document
- o Preparing required reports
- o Maintain appropriate files
- o Fill out hazardous waste labels

Date: 1/20/83
Revisions No.: 1
H

Position Title: Emergency Coordinator

Name of employee: Orville Gauger

Position Responsibilities:

- o Report to Fred Peterson, Jr.
- o Act as emergency coordinator in all emergency situations involving release of hazardous wastes

EMPLOYEE TRAINING PROGRAM

Training Requirements

The EPA hazardous waste management regulations require the following to establish personnel training programs:

Owners/operators of treatment, storage and disposal (TSD) facilities;

Generators who accumulate hazardous waste for 90 days or less.

The personnel training requirements can be found in 40 CFR 265.16. The training program must:

Include classroom instruction or on-the-job training.

Be directed by a person trained in hazardous waste management procedures.

Include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

Be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable: Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;

Describe communications or alarm systems;

Include response to fires or explosions;

Include response to groundwater contamination incidents;

Facility personnel must have successfully completed the program by May 19, 1981, or six months after the date of their employment, or assignment to a facility, whichever is later. Employees hired after November 19, 1980, must not work in unsupervised positions until they have completed the training program.

Facility personnel must take part in an annual review of the initial training program.

The owner/operator must maintain the following documents and records at the facility:

The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

A written job description for each position at the facility related to hazardous waste management. The description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.

A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.

Records documenting that the required training or job experience has been given to, and completed by, facility personnel.

Training records on current personnel will be kept until closure of the facility. Training records on former employees will be kept for at least three years from the date the employee last worked at the facility. Personnel training records will accompany personnel transferred within the company.

In order to teach the facility personnel as required under RCRA, we have developed a series of lessons. New employees who have not taken an NWTI Hazardous Waste course shall undergo an initial training period based on these lesson plans.

In addition to the classroom sessions, each employee will be a probationary employee working under direct supervision during the first 90 days of employment. During this period, the employee will be receiving on-the-job training, which will include every RCRA related procedure which is relevant to his duties.

At the completion of each training session and/or at the completion of the final training session, each trainee must successfully pass an examination, which is designed to indicate a reasonable understanding and capability of performing his/her duties in keeping with the requirements of RCRA regulations.

We will have a two to four-hour annual review of these lessons required of each employee.

Training records will be kept for each person throughout his/her employment and for three years after termination. One copy of these records will be kept in the RCRA files, and another copy will be kept with personnel records.

No employee will be allowed to work unsupervised until he has successfully completed the training programs.

Each new employee with responsibilities in the hazardous waste management program will be given, at date of hire, the following training aids and information:

- Guidelines to emergency response in event of fire or explosion.

- Guidelines to emergency response in event of release of hazardous waste.

- General safety orders for plant maintenance, production, shipping, receiving, laboratory personnel and drivers.

- Evacuation plan by department, in event of emergency.

- Current list of names of personnel with CPR and first aid training.

- Shipping and receiving employees will receive labeling and placarding guides with EPA and DOT rules and regulations for shipping and receiving "hazardous materials".

- Each employee will receive information related to working hours, sick pay, vacation schedule, etc.

- A special class will be held for all personnel who are directly or indirectly involved in loading or unloading flammable liquid, or are involved in pumping into or out of a drum, or involved with the transfer of flammable liquid in any manner. Classroom instruction will cover static electricity and grounding.

- Each new employee will be expected to familiarize him/herself with the information given them for a better understanding of forthcoming classroom instructions.

- Each new employee in the hazardous waste program is issued all necessary safety gear, safety glasses, hard hat, chemical gloves, etc., and is then taken on a plant tour, showing him/her the location of all emergency equipment, first aid stations, emergency showers, electrical emergency shut-offs, fire prevention equipment, alarm systems (telephone and intercom), and the emergency telephone number list posted in a conspicuous place by each telephone. They are also instructed on how to use the intercom in the event of an emergency.

- Each employee will be required to know the location of all emergency response equipment and will be tested on completion of lesson No. 1. During the course of tenure here, he/she will receive in-plant training for fire prevention.

EMPLOYEE TRAINING PROGRAM

LESSON NO. 1

EMERGENCY RESPONSE IN EVENT

OF FIRE OR EXPLOSION

Lesson No. 1

EMERGENCY RESPONSE IN EVENT OF FIRE OR EXPLOSION

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

Coverage: 40 CFR, Parts 264-265

TOPICS DISCUSSED:

Subpart D, Section 265.50 through 265.56

1. General discussion and coverage of Subpart D.

Overall coverage of types of fires and kinds of equipment pertaining to and relating to our facility operation.

- I. Three types of fires are wood, electrical, and chemical.

- A. A wood fire is classified as combustible.

1. To control, use water to quench or cool fire. A dry powder chemical may also be used effectively.

- B. A chemical fire is caused from vapor air mixture over flammable liquids igniting.

1. To control, use dry chemical powder (preferred), also can use foam, vapor liquid, or water fog spray depending on circumstances.

- C. Electrical fires usually start through short-circuiting or overload on line, etc.

1. To control, use only non-conductive dry chemicals or carbon dioxide

II. Flammable Liquids: The Four Characteristics

- A. Fire point - lowest temperature that a flammable air vapor mix will ignite without spark or flame.

- B. Flash point - lowest temperature that liquid gives off enough vapors to ignite.

- C. Ignition temperature - temperature that a flammable vapor air mix will burn without ignition.

- D. Flammable or explosive range - the range between the smallest and largest amount of vapor in a given quantity of air which will explode or burn when ignited.

III. Classification

- A. The proper classification of fire is of vital importance as it determines the way the fire must be put out.

IV. Elements

- A. There are three elements needed to make a fire burn. They are:
 - 1. Heat - to stop fire, remove the heat.
 - 2. Fuel - to stop fire, remove the fuel.
 - 3. Oxygen - to stop fire, remove the oxygen or stop the reaction.

V. Prevention

- A. An effective in-plant fire protection plan depends on two things. They are:
 - 1. Knowledgeable personnel
 - 2. The correct and sufficient amount of fire fighting equipment (Sec. 264.32).

VI. Instructions

- A. The proper way to use dry powder extinguishers.
- B. In event of fire, take action as prescribed (40 CFR 264.56) in company emergency response program.
- C. Learn how and when to use intercom or telephone for emergency.
- D. Who to call? Fire department first? Coordinator first?
- E. How to identify characteristics of fire and type and danger involved.
- F. What's involved? Drums, tanks, equipment, electricity? or solvent spill?
- G. Should emergency switches (electric) be shut off?
- H. Is fire controllable or uncontrollable?
- I. What are the coordinators duties?

- J. Orderly evacuation in case of fire.
- K. Caution on how and when to use water to fight fire.
- L. What to do if you have a victim.

VII. Coordinator

- A. Emergency coordinator will direct and assess the possible hazards to human health and life or environment and take needed steps to protect life and property, inform proper authorities, attempt to contain the fire, save property and records, call for evacuation.

TEST: LESSON NO. I

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job

classification _____

1. Name three types of fires.
2. What is their classification using A.B.C.?
3. Name three kinds of fire fighting equipment.
4. Name three kinds of agents used to fight fires.
5. What kind of fire is each used for?
6. What are the first three things you should do if you sight a fire?
7. Name the locations of emergency power shut-off switches.
8. How many are there?
9. Explain the difference between a controllable fire and an uncontrollable fire.
10. What is the procedure for giving an alarm?
11. Where are emergency phone numbers listed?
12. On the three plot plans showing location of buildings, grounds, etc., fill in the location of each of the following, using the signs given:

Plot Plan #1

- * Emergency electric power shut-off.
- X Phones for emergency alarm system.
- ? Mobil (dry powder) fire extinguisher.
- () Portable hand held extinguishers.

Plot Plan #2

- * Fire hose (box)
- X Water hydrant
- ? First aid station
- () Emergency showers & eye wash

EMPLOYEE TRAINING PROGRAM

LESSON NO. 2

EMERGENCY RESPONSE IN EVENT OF A

RELEASE OF HAZARDOUS WASTE

Lesson No. 2

EMERGENCY RESPONSE IN THE EVENT OF A RELEASE OF A HAZARDOUS WASTE

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

TOPIC DISCUSSED

General instructions covering 40 CFR, 264.16.

All employees are required to become familiar with and to learn the location of all in-plant emergency equipment, e.g. shovels, sand, pumps, hoses, fire extinguishers, absorbent bags, etc.

- I. Emergency procedure as programmed for our facility in event of a spill or release of a hazardous substance.
 - A. Try to identify the character of the spill or release as instructed in Lesson No. 1.
 - B. Identify the source, amount and real extent of release.
 - C. You must notify your emergency coordinator (via intercom if necessary) and your immediate supervisor.
 - D. Standby with all necessary fire equipment in case of an ignition.
 - E. Suspend all operations until spill (as in case of a ruptured drum of flammables) is cleaned up and vapors have dissipated.
 - F. Don't allow spill to escape from paved area onto ground area, dike if necessary.
 - G. Don't allow any vehicle to operate in close proximity of spill (because of possible ignition) until cleaned up.
 - H. Procedures to follow if ground has been contaminated follow Sec. 264.56(g).
 - I. Reporting when clean-up is finished if necessary.
 - J. All instructions have covered events typical of and pertinent to our operation; e.g., flammable solvents.

II. Hazardous Waste Discharge in Transit

- A. A hazardous waste discharge is defined as the accidental, or intentional spilling, leaking, pumping, pouring, emitting, or dumping of a hazardous waste onto land or water.

III. For a Discharge in Transit

In most cases, the State Police or Highway Patrol will be the first to arrive on the scene of an accident, and the driver will give them the emergency telephone numbers of those people or agencies whom he wishes to contact. The law requires that the driver remain at the scene and keep his vehicle within his sight.

A. Action required.

1. Take immediate action to protect human health and environment.
2. Put out all necessary approved warning signs for traffic. If vehicle is placarded combustible or flammable, driver must not allow anyone to use road flares or smoke.
3. Notify the local authorities as soon as possible. Arrange to have someone call the National Response Center.
4. Dike the area if necessary, to prevent run-off into drain lines or waterways.
5. Cooperate with local authorities as to identification of material utilizing manifest, shipping papers, etc.
6. If necessary call Chem Trec at 1-800-424-9300.

B. Clean-Up

1. Transporter is responsible for clean-up.

C. Reference

1. Federal Register, May 19, 1980 (45 FR, 33150-33152) 40 CFR, 261.31.

IV. Hazardous Waste Discharge

A. Procedure

1. Keep in mind throughout training that of utmost importance is action No. 1, which is to take

immediate action to protect human health and environment.

2. National Emergency Response Center 1-800-424-8802.

TEST: LESSON NO. 2

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. What is the most important thing to remember in case of a spill or release of hazardous waste?
2. Name the emergency coordinator for response.
3. Do you need to manifest any earth (soil) that has been contaminated from a spill and removed?
4. In event of a spill, is it necessary to shut-off all ignition sources?
5. What type of personal safety equipment is used when cleaning up a spill?
6. If you had to evacuate, would you be able to do so without indecision?
7. Where is the closest phone in relationship to your work area?
8. Name three kinds of flammable solvents.
9. What is the name of the person in your area with CPR and Red Cross training?
10. Should you fill out a spill report for five gallons or less spilled?
11. Name three actions needed for an in-plant emergency response for a release of hazardous waste; e.g., a drum of flammable liquid ruptures while loading.
12. Are vapors harmful?
13. What method do we use as an alarm for emergency response?
14. Where is the closest exit from your work area?

15. What is meant by the character of the release?

16. If you had a spill or release of hazardous waste while in transit, which one of these authorities would you call first, second, third, etc. (a) highway patrol, (b) plant emergency coordinator, (c) National Emergency Response Center, (d) fire department.

EMPLOYEE TRAINING PROGRAM

Lesson No. 3

NEW FEDERAL & STATE RULES, REGULATIONS FOR

THE GENERATOR, TRANSPORTER & TREATMENT

STORAGE OR DISPOSAL OF HAZARDOUS WASTE

- RCRA -

- EPA -

- DOT -

STATE AGENCY

Lesson No. 3

NEW FEDERAL & STATE HAZARDOUS RULES & REGULATIONS

Classroom instruction time 1-1/2 hours

Question and answer session 15 minutes

Testing time 15 minutes

TOPIC DISCUSSED

EPA - Environmental Protection Agency
DOT - Department of Transportation
STATE AGENCY - States new rules that apply

A. Direct impact - 49 CFR, Sec. 172.205(a)

1. No person may offer for transportation, transport, transfer, or deliver a hazardous waste, unless a hazardous waste manifest is prepared, signed, carried and given as required of that person by this section.

B. Direct impact - 40 CFR, Sec. 262.12

1. A generator must not treat, store, dispose of, transport or offer for transportation, hazardous waste without having received an EPA identification number from the administrator.
2. A generator must not offer his hazardous waste to transporters, treatment, storage, or disposal facilities that have not received an identification number from EPA.

C. Other agencies

FHA - Federal Highway Administration
BMCS - Bureau of Motor Carrier Safety
MTB - Material Transportation Bureau
USCG - United States Coast Guard
NFPA - National Fire Protection Agency
TSSC - Toxic Substances and Strategy Committee

TEST: LESSON NO. 3

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. Who is EPA? Give their full name.
2. Who is DOT? Give their full name.
3. What is their function?
4. How are the two related?
5. Explain the "cradle-to-the-grave theory".
6. What is the minimum fine for a violation?
7. What does TSD stand for?
8. What denotes a TSD facility?
9. How long can you store hazardous waste before you become a storage facility?
10. Is oil from halogenated solvents considered a hazardous waste?
11. Give the definition of a hazardous waste.
12. Name the four characteristics.
13. When is a manifest necessary?
14. When do you become a generator?
15. 1000 kilograms represents approximately how many drums?
16. How many pounds is 1000 kilograms?

EMPLOYEE TRAINING PROGRAM

Lesson No. 4

MANIFESTING A HAZARDOUS WASTE

A. GENERATOR

B. TRANSPORTER

C. TSD FACILITY

MANIFESTING A HAZARDOUS WASTE

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 30 minutes

TOPICS DISCUSSED:

Manifesting:

- A. Generator
- B. Transporter
- C. TSD Facility

Subpart B, Sec. 262.20 through 262.23.

Instruction covering:

- A. Newly formulated EPA rules and regulations that went into effect November 19, 1980 (Part 262) and their effect, step-by-step explanation using the State of Wisconsin's hazardous waste manifest as an example.
- B. Copies (filled in examples) of new hazardous waste manifests are given to each one present. Also, a copy of hazardous waste labels that will be required on each drum of hazardous waste offered for transportation as per 49 CFR, Sec. 172.304 and 40 CFR, Sec. 262.32.
- C. Explain that all shipments of hazardous waste in bulk or drums must be accompanied from cradle-to-grave by a State of Wisconsin hazardous waste manifest. Explain in detail as to how it should be filled in, by whom it should be signed, and that all four copies must be legible. Signatures should be full name (not initials) and legible.
- D. Explain that a small generator is one who generates less than 1,000 kilograms (or 2,205 pounds) of hazardous waste a month, which is approximately four drums and does not need an EPA number. A generator can't keep material longer than 90 days on his premises without becoming a storage facility.

- E. Copies go to whom and where?
1. #1 copy to TSD facility (send copy to DNR).
 2. #2 copy to transporter from TSDF.
 3. #3 copy to generator from TSDF.
 4. #4 copy generator keeps (send copy to DNR).
- F. Who has to fill out manifests? Anyone who transports or offers for transport any amount of hazardous waste.
- G. Manifest is also a shipping document.
- H. The new hazardous waste labels that must be on each drum and dated and filled out are in addition to, and not separate from, the previously existing DOT rules and regulations regarding specified containers and correct labeling. Need to make sure containers have proper gaskets, the bungs are tight and tops are clean and free from waste.
- I. The DOT hazardous waste label should be placed on all waste solvent as Solvent N.O.S.
- J. For safe transportation, drums of hazardous waste should (because of vapor pressure) be filled to only 50 gallons maximum. Within 24 hours before shipping, check for leaks.

(SECTION #1)

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. What is the reason for a manifest?
2. When do you use it?
3. Are manifest different in different states?
4. If there is a conflict between city, county, or state and federal regulations, what rule applies?
5. How many copies are needed?
6. How are they distributed?
7. Is it all right to abbreviate; e.g., M.E.K., I.P.A.?
8. Can you leave some areas of the manifest blank if you don't understand?
9. What are the four characteristics of hazardous waste?
10. Is the manifest acceptable as a shipping document?
11. What is meant by units?
12. Must a transporter always take the hazardous waste to the TSD facility designated on the (paperwork) manifest?
13. What is the UN/NA number?
14. How long can you store hazardous waste without becoming a storage facility?

TEST: Lesson No. 4

(SECTION #2)

MANIFESTING

Instructor _____
Date _____

Employee's
name _____
Grade _____

Job
classification _____

Notice to students attending this class:

At the close of the question and answer session, a blank copy of the State of Wisconsin hazardous waste manifest will be given to each student to fill in correctly using the example given and information therein. These manifests will be graded for accuracy and recorded.

Manifest the following example:

20 drums of hazardous waste lacquer thinner.
Component % approximately:

- 30% - Methyl Ethyl Ketone
- 20% - Toluene
- 16% - Paint Sludge
- 4% - Water
- 4% - Acetates
- 14% - Ketones
- 6% - Aromatics
- 6% - Esters

For fictitious names use Mary Doe, John Doe, etc.

EMPLOYEE TRAINING PROGRAM

LESSON NO. 5

- A. LABELING OF HAZARDOUS
WASTE FOR TRANSPORTATION
AND STORAGE.
- B. PLACARDING AND MARKING

Lesson 5

LABELING OF HAZARDOUS WASTE

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes

TOPICS DISCUSSED:

40 CFR - Pretransportation requirements, EPA & DOT

Regulation

- 262.30 - Packaging - 49 CFR, Parts 173, 178, 179.
- 262.31 - Labeling - 49 CFR, Sec. 172.400
- 262.32 - Marking - 49 CFR, Sec. 172.300
- 262.33 - Placarding - 49 CFR, Sec. 172.504
- 262.34 - Accumulation Time

Class was instructed in all the above sections, noting that EPA rules are in addition to, and not separate from, DOT's rules and regulations, and that whenever a city, county, or state regulation comes in conflict with Federal regulations, then most stringent rule shall apply.

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. What kind of DOT container is needed for shipping 55 gallons of waste methyl ethyl ketone?
2. What kind of a DOT container would you use if shipping 55 gallons of waste acetone?
3. Would you place a hazardous waste label on the top or the side of the drum?
4. Would an empty 55-gallon drum which previously contained hazardous waste need to be manifested?
5. What is EPA's definition of an empty container?
6. Do you need to put the accumulation date on a hazardous waste label?
7. What is the definition of an incompatible substance?
8. Where in 49 CFR would you look to find the proper shipping name?
9. How long must a generator keep a drum of hazardous waste before shipping? Why?
10. Should the generator and transporter section in a manifest be filled out correctly before transporting?
11. Write a proper shipping name for a mixture of hazardous waste e.g., 20% acetone, 40% mineral spirits, 40% kerosene.

EMPLOYEE TRAINING PROGRAM

Lesson No. 6

A. PRECAUTIONS FOR HANDLING HAZARDOUS WASTE ETC.

B. INSPECTION OF HAZARDOUS WASTE STORAGE AND FACILITY AREA.

HANDLING & INSPECTION OF HAZARDOUS WASTE-REQUIREMENTS,
COMPLIANCE, PRECAUTIONS, ETC.

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

TOPICS DISCUSSED:

Storage of hazardous waste and use and management of Subpart I, 40 CFR, 265.170, 265.171, 265.172, 265.173, 265.174, 265.176, 265.177, 265.190

Class was instructed to make sure before shipping any hazardous waste that the transporter has obeyed all rules and regulations and that the containers, if drums, are properly labeled with accumulation dates and labeled in accordance with DOT regulations, with correct EPA waste (hazardous) label on drum, and that containers were in proper condition using the following steps:

1. Make sure manifest is in order.
2. Make sure labels on drums match the information on the manifest.
3. If there is any discrepancy in count, note on manifest before giving transporter his copy.
4. Before loading, check all drums to see if they are in good condition or leaking. If needed, transfer the ones that don't comply.
5. Stack drums in a safe manner according to category.
6. Make sure aisle ways and exits are kept clear throughout the storage area.
7. Observe all applicable general safety rules for forklifts.

I N S P E C T I O N S E C T I O N

HAZARDOUS WASTE STORAGE INSPECTION

1. One person assigned to daily check on a walk-through of all storage areas (keeping a record of inspection) to see if any containers are leaking or seeping, and to report anything that needs correction.

2. A walk-through once a week through the entire facility by a qualified person to inspect and identify any problem that might lead to: (a) a release of hazardous waste, (b) a threat to human health, (c) a written report will be kept on file covering weekly inspection for the following:

1. Malfunctions
2. Deterioration
3. Operator errors
4. Check containers
 - (a) Improper construction
 - (b) Leaks or corrosion

and noting on checklist inspection of storage tanks, containers, dikes, retaining walls, emergency equipment, alarm systems, safety equipment, fire fighting equipment, security locks, warning signs, leaking valves, etc.

TEST: LESSON NO. 6

Instructor _____
Date _____

Employee's
name _____
Grade _____

Job
classification _____

1. What label is required by EPA on a drum of waste?
2. Where should the label be placed? Why?
3. How often should storage area be checked for leakers?
4. How full should a 55-gallon drum be filled to be safe for transportation?
5. If you notice that a drum of waste is leaking, should you transfer it immediately or wait until you have time?
6. Is it all right to tighten a bung on a drum without a gasket? Are gaskets required?
7. Are the EPA number and the manifest number supposed to be on the hazardous waste label?
8. What about the accumulation date?
9. Why is routine inspection so vital?

SECTION I

CLOSURE PLAN AND
FINANCIAL REQUIREMENTS

SECTION I

CLOSURE PLAN & FINANCIAL REQUIREMENTS

I. Facility Conditions

A. General Information

1. The waste flammable liquid holding area is 24' X 42' metal building located as shown on the enclosed layout. Both loading and unloading area and the floor are of impervious cement.
2. All ignitable (hazardous) wastes are put in 55 gallon drums at either Plant #1 or Plant #2 and shipped to this area for accumulation prior to shipping to a recycling facility. These drums are stored directly on the concrete floor or pallets.
3. The principle type of waste stored is waste non-halogenated solvents which are used to clean painting equipment. Typical solvents used are toluene, butyl acetate and cellosolve acetate.

B. Maximum amount of waste inventory is two hundred 55-gallon drums (11,000 gallons).

C. Equipment Inventory

1. One fork lift
2. Miscellaneous hand tools
3. Miscellaneous safety equipment
4. Miscellaneous spill recovery equipment

D. Closure Schedule

1. Removal of Inventory - During the first 30 days of closure, all inventory will be removed and disposed of.
2. Decontamination - During the second 30 day period of closure, the facility will be decontaminated as described below and all residues will be removed and disposed of.

II. Removal of Inventory

All waste solvent will be disposed of by recycling. Sheboygan Paint Company, Sheboygan, Wisconsin is currently transporting all such waste to their facility for recycling, free of charge, and there is no pretreatment which is required before Sheboygan Paint Company will accept waste solvent for shipment. No treatment or disposal will occur

at Peterson Builders' facilities. Prior to loading, all drums are inspected for leakage, damage, and proper labeling, and also proper manifest forms are completed.

III. Facility Decontamination

A. Structures

The floor and the loading dock are the only structures that will possibly need any decontamination. This surface will first be scraped free of any residue and then steam cleaned and rinsed with water. All residue will be placed in a 55-gallon drum using hand tools. All excess water will be collected by a wet vacuum and placed in the same drum.

B. Equipment

All equipment used in decontaminating structures in the daily operation of the facility will be steam cleaned and rinsed with water. The rinse water will be collected as above and placed in a 55-gallon drum.

- C. The amount of waste generated by the decontamination process will not exceed two 55-gallon drums, which will be disposed of in the same manner as discussed for inventory.

The facility superintendent will monitor all activities to ensure conformance with this plan.

IV. Financial Responsibility

See Appendix C.

V. Post Closure

- A Due to the nature of this facility, post-closure requirements including post-closure bonds are not applicable.

PETERSON BUILDERS, INC.
CLOSURE COST ESTIMATE

- I. Removal of Inventory
2 manhours X 10.62 per hour

\$ 21.24

The only closure cost involved would be for assisting in loading operations. There is no charge for transportation or recycling of waste solvent generated by Peterson Builders, Inc. Sources other than Sheboygan Paint Company are Ashland Chemical Company, 204 Madison Street, Neenah, Wisconsin, and Hy-Drite Chemical Company, 191 W. 28th Street, Oshkosh, Wisconsin.

II. Decontamination

A. Structures

4 manhours X \$10.62 per hour

\$ 42.48

B. Equipment

2 manhours X \$10.62 per hour

\$ 21.24

C. Disposal of Residue from Decontamination
(2 drums) @ \$150 per drum

\$ 300.00

III. Administration and Contingencies

- A. Administration includes paperwork associated with closure activities and supervision of all activities.
15% of direct cost

\$ 57.75

B. Contingencies

\$1.00/gal X 2750 gals

For incineration in the unlikely event that recycling sources would not be available

\$2750.00

\$3192.70

SECTION J

OTHER FEDERAL LAWS

Information will be provided in accordance with the requirements of 40 CFR part 122.25(a)(20) at the request of the EPA Region V office. At this time, however, we believe this facility is in compliance with the following federal laws: Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, and the Fish and Wild Life Coordination Act.



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

26 January 1983

I, Joseph Gagnon, Vice President and General Manager of Peterson Builders, Inc., a Wisconsin Corporation, in accordance with 40 C.F.R. 122.6 and Section NR 181.55 (3) (b) of the Wisconsin Administrative Code, hereby designate John L. Beales and Gary Higgins to sign, individually, for Peterson Builders, Inc., any certification required by said regulations.

For: PETERSON BUILDERS, INC.

By :

By :

Joseph Gagnon
Vice President

I certify under penalty of law that I have examined and am familiar with the information submitted in the Peterson Builders, Inc., Hazardous Waste Permit Application dated January, 1983 and submitted herewith, and in all attachments thereto, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

For: PETERSON BUILDERS, INC.

By :

By :

John L. Beales

APPENDIX A

HAZARDOUS CHARACTERISTICS OF MATERIALS

HAZARDOUS CHARACTERISTICS OF MATERIALS

TOLUENE - Syns: methylbenzene, phenylmethane, toluol. Colorless liquid, benzol-like odor. Flash point 40° F

It may cause considerable discomfort if inhaled or ingested by mouth. It may cause some skin discomfort which readily disappears after exposure stops. Toluene is derived from coal tar, and commercial grades usually contain small amounts of benzene as an impurity. Acute poisoning, resulting from exposures to high concentration of the vapors, are rare with toluene. Inhalation of 200 ppm of toluene for 8 hours may cause impairment of coordination and reaction time; with higher concentration (up to 800 ppm) these effects are increased and are observed in a shorter time. In the few cases of acute toluene poisoning reported, the effect has been that of a narcotic, the workman passing through a stage of intoxication into one of coma. Recovery following removal from exposure has been the rule.

Exposure to concentration up to 200 ppm produces few symptoms. At 200-500 ppm, headache, nausea, loss of appetite, a bad taste, lassitude, impairment of coordination and reaction time are reported, but are not usually accompanied by any laboratory or physical findings of significance. With higher concentration, the above complaints are increased, and in addition, anemia, leucopenia and enlarged liver may be found in rare cases.

A common air contaminant.

Fire Hazard: Slight, when exposed to heat, flame or oxidizers.

Explosion Hazard: Moderate, when exposed to flame or reacted with sulfuric plus nitric acid, and silver chlorate.

Disaster Hazard: Moderately dangerous; when heated, emits toxic fumes can react vigorously with oxidizing materials.

To Fight Fire: Foam, CO₂, dry chemical.

LACQUERS. Solutions of resins, gums or plastics in an organic solvent.

Flash p: 0°-80° F.

They may cause allergic reactions and are considered common air contaminants.

Fire Hazard: Dangerous, when exposed to heat or flame. A large part of the great fire hazard of lacquers is due to the solvents commonly used.

Explosion Hazard: Severe, in the form of vapor when exposed to flame.

Disaster Hazard: Dangerous. Keep away from heat and open flame; they can react vigorously with oxidizing materials.

Explosive Range: Variable

To Fight Fire: CO₂, dry chemical, water spray.

ETHYL ACETATE. Syns: acetic ether, ethylester, ethyl ethanoate. Colorless liquid, fragrant odor. Flash point 24° F

It may cause skin discomfort which readily disappears after exposure stops. It may cause considerable discomfort when inhaled or ingested by mouth.

Ethyl acetate is irritating to mucus membrane surfaces, particularly the eyes, gums and respiratory passages, and is also mildly narcotic. It can cause skin irritation. High concentrations have a narcotic effect and can cause congestion of the liver and kidneys. Chronic poisoning has been described as producing secondary anemia, leucocytosis and cloudy swelling, and fatty degeneration of the viscera.

Fire Hazard: Dangerous, when exposed to heat or flame; can react vigorously with chlorosulfonic acid.

Explosion Hazard: Moderate, when exposed to flame

Disaster Hazard: Dangerous, upon exposure to heat or flame.

To Fight Fire: CO₂, dry chemical or alcohol foam.

FIRE OR EXPLOSION

Will burn. May be ignited by heat, sparks and flames.
Flammable vapor may spread away from spill.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind, keep out of low areas.
Isolate hazard area and deny entry.
Wear self-contained breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank or tankcar is involved in fire.
FOR EMERGENCY ASSISTANCE CALL CHEMTREC (800) 424-9300.
Also, in case of water pollution, call local authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Stay away from ends of tanks
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles.
If this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or discoloration of tank.

SPILL OR LEAK .

No flares, smoking or flames in hazard area.

Stop leak if you can do it without risk.

Use water spray to reduce vapors.

Small Spills: Take up with sand, or other noncombustible absorbent materials, then flush area with water.

Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air, call emergency medical care.

If not breathing, give artificial respiration.

If breathing is difficult, give oxygen.

In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.

Remove and isolate contaminated clothing and shoes.

APPENDIX B

INSPECTION LOG SHEETS

PETERSON BUILDERS OPERATING AND STRUCTURAL EQUIPMENT INSPECTION LOG SHEET

Inspector's name/title _____ / _____
 Date of inspection _____ (month/day/year)
 Time of inspection _____ (military time)

Item	Types of problems	status		Date and nature of
		Acceptable	Unacceptable	
Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots			Observations repairs/medical action
Debris and refuse	aesthetics, possible reaction with leaks			
Emergency Equipment	Protective clothing absorbants over-pack drums etc.			

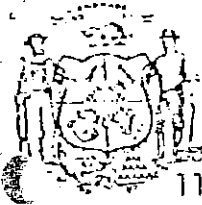
PETERSON BUILDERS CONTAINER STORAGE AREA INSPECTION LOG SHEET

Inspector's name/title _____/_____
 Date of inspection _____ (month/day/year)
 Time of inspection _____ (military time)

Item	Types of problems	status		Date and nature of
		Acceptable	Unacceptable	
Segregation of incompatible wastes	Storage of incompatible wastes in area			Observations repairs/medical action
Container placement	Aisle space,			
Sealing of containers	Open lids			
Labeling of containers	Improper identification, date missing			
Containers	Corrosion, leakage structural defects			
Warning signs	Damaged			

APPENDIX C

FINANCIAL MECHANISM



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
1125 N. Military
Box 3600
Green Bay, WI 54303-1208

Carroll D. Besadny
Secretary

January 11, 1982

File Ref: 4400

Mr. Gary Higgins
Peterson Builders, Inc.
P. O. Box 47
Sturgeon Bay, WI 54235-0047

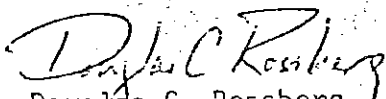
Dear Mr. Higgins:

Re: Variance Request
Proof of Financial Responsibility
Acknowledgment of Receipt

Copies of the variance request form, EPA Part A application, a closure cost estimate and the proof of financial responsibility instrument for Peterson Builders, Inc., located at 107 East Walnut Street, Sturgeon Bay, Wisconsin, EPA ID #WID096828975, were received by the Wisconsin Department of Natural Resources on September 8, and December 1, 1981. According to your submittal, this facility stores hazardous waste. We will notify you when our review of your submittal is complete, when we plan to inspect your facility and when we approve or disapprove of your request.

If you have any questions regarding this stage of the variance issuance process, please feel free to contact me or Tom Blake at 414-497-4397.

Sincerely,


Douglas C. Rossberg
Solid Waste Coordinator

cc: Systems Management Section - Attn: Wayne Ringquist, SW/3

LEAVE BLANK - DNR USE ONLY
Regulatory Code
EPA Identification Number
License Number
Name of Licensee
Closure Cost Estimate

KNOW ALL MEN BY THESE PRESENTS, that Peterson Builders, Inc.
(Owner)
of 101 Pennsylvania St., Sturgeon Bay, WI 54235, as Principal, and
(Address)

United Fire & Casualty Company, a surety company organized
(Name of Surety Company)

and existing under the laws of the State of Iowa and duly authorized to do surety business in
the State of Wisconsin, as Surety, are held and firmly bound unto the State of Wisconsin Department of Natural Resources, as
-Two and 70/100
Obligee, in the penal sum of Three Thousand One Hundred Ninety dollars (\$ 3192.70*****), for payment of which
the Principal and the Surety bind themselves, their heirs, executors, administrators, successors and assigns, jointly and severally.

WHEREAS, the Principal owns a solid waste land disposal site or hazardous waste facility named _____
located in _____, Town/City/Village of
(Section, Township and Range)

Sturgeon Bay, Door County, Wisconsin, and that site or facility
is subject to either the closure requirements of the plan of operation approval issued by the Obligee, dated this 21th day
of November, 19 81, and any amendments thereto or the closure requirements of sections NR 181.42(8)
and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable to the site or facility.

WHEREAS, section 144.44(3)(c), Wisconsin Statutes, requires that the Principal provide the Obligee with proof of financial
responsibility ensuring that the closure requirements of the plan of operation approval, if any, will be complied with by the
Principal and any successor in interest.

WHEREAS, this bond is written to provide proof of financial responsibility pursuant to section 144.44(3)(c), Wisconsin
Statutes, and section NR 180.15 or NR 181.42(10), Wisconsin Administrative Code, to ensure compliance with the closure
requirements of the plan of operation approval and any amendments thereto or the closure requirements in sections NR
181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and shall inure to the benefit of the
Obligee.

NOW, THEREFORE, the condition of this obligation is such that if the Principal or any successor in interest complies with
the closure requirements of the plan of operation approval and any amendments thereto or the closure requirements in sections
NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and closes the facility identified above
in accordance with these closure requirements then and only then, this obligation shall be void; otherwise, it shall remain in
full force and effect.

The Surety shall become liable on this bond obligation only upon a determination by the Obligee, subject to judicial review,
that the Principal has failed to fulfill the above condition. Following such a determination, the Surety must either complete
closure of the facility in accordance with the plan of operation approval and any amendments thereto or the closure
requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, or pay the
amount of this bond as directed by the Secretary of the Obligee.

Liability of the Surety shall not be discharged by any payment or succession or payment of the Principal or any successor in interest. Payment or payments shall amount in the aggregate to the full penal sum of this bond, but in no event shall the obligation of the Surety thereunder exceed the full penal sum of this bond. Release or discharge of the Surety shall not release the Principal or any successor in interest from the obligation to fully and completely comply with all closure requirements of the plan of operation approval and any amendments thereto or all closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable. The insolvency or bankruptcy of the Principal shall not constitute a release to the Surety with regard to any claim of liability on the obligation of this bond. No amendment to the plan of operation approval will release the Surety from its obligation under this bond.

The Surety hereby waives notification of any failure on the part of the Principal or any successor in interest to faithfully comply with the terms of the plan of operation approval or any amendments thereof or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and lack of notice from the Obligor will not bar or limit recovery against the Surety.

This bond is effective on the 24th day of November, 19 81, and shall continue in force until terminated as hereinafter provided. As long as any obligation of the owner or any successor in interest for closure in accordance with the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, exists, this bond shall not be cancelled by the Surety unless a replacement bond or other proof of financial responsibility acceptable to the Obligor is provided to the Obligor. If the Surety proposes to cancel this bond, notice shall be provided to the Obligor and the Principal in writing by registered or certified mail not less than 90 days prior to the proposed cancellation date. Not less than 30 days prior to the expiration of the 90 day notice period, the Principal shall deliver to the Obligor a replacement bond or other proof of financial responsibility acceptable to the Obligor. In the absence of the delivery of a replacement bond or other acceptable proof of financial responsibility, all site or facility operations shall immediately cease and this bond shall remain in full force and effect as long as any obligation of the Principal or any successor in interest for closure in accordance with the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, remains unsatisfied.

Signed, sealed and dated this 24th day of November, 19 81.
PETERSON BUILDERS, INC.

[Signature]
Principal

UNITED FIRE & CASUALTY COMPANY
Surety



[Signature]
Attorney in Fact
Robert J. Stoneman

Bond Number _____

CERTIFIED COPY OF POWER OF ATTORNEY

(Original on file at Home Office of Company - See Certification)

KNOW ALL MEN BY THESE PRESENTS, That the UNITED FIRE & CASUALTY COMPANY, a corporation duly organized and existing under the laws of the State of Iowa, and having its principal office in Cedar Rapids, State of Iowa, does make, constitute and appoint Robert J. Stoneman, or Patricia J. Schopf, or Peter C. Stoneman, or Francis J. LeRoy, All Individually

Sturgeon Bay, Wisconsin

true and lawful Attorney(s)-in-Fact with power and authority hereby conferred to sign, seal and execute in its behalf all lawful bonds, undertakings and other obligatory instruments of similar nature as follows: Any and all bonds in an amount not exceeding Five Hundred Thousand and no/100 (\$500,000.00) Dollars

and to bind UNITED FIRE & CASUALTY COMPANY thereby as fully and to the same extent as if such instruments were signed by the duly authorized officers of UNITED FIRE & CASUALTY COMPANY and all the acts of said Attorney, pursuant to the authority hereby given are hereby ratified and confirmed.

The Authority hereby granted shall expire November 29, 1982 unless sooner revoked.

This power of Attorney is made and executed pursuant to and by authority of the following By-Law duly adopted by the Board of Directors of the Company on April 18, 1973.

"Article V - Surety Bonds and Undertakings."

Section 2. Appointment of Attorney-in-Fact. "The President or any Vice President, or any other officer of the Company, may, from time to time, appoint by written certificates attorneys-in-fact to act in behalf of the Company in the execution of policies of insurance, bonds, undertakings and other obligatory instruments of like nature. The signature of any officer authorized hereby, and the Corporate seal, may be affixed by facsimile to any power of attorney or special power of attorney or certification of either authorized hereby; such signature and seal, when so used, being adopted by the Company as the original signature of such officer and the original seal of the Company, to be valid and binding upon the Company with the same force and effect as though manually affixed. Such attorneys-in-fact, subject to the limitations set forth in their respective certificates of authority shall have full power to bind the Company by their signature and execution of any such instruments and to attach the seal of the Company thereto. The President or any Vice President, the Board of Directors or any other officer of the Company may at any time revoke all power and authority previously given to any attorney-in-fact.

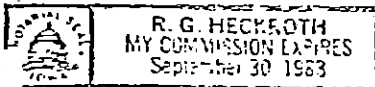
IN WITNESS WHEREOF, the UNITED FIRE & CASUALTY COMPANY has caused these presents to be signed by its vice president and its corporate seal to be hereto affixed this 29th day of November, A.D. 1980.

UNITED FIRE & CASUALTY COMPANY

By *Richard J. Ehlinger*
Vice President

State of Iowa, County of Linn, ss:

On this 29th day of November 1980, before me personally came Richard J. Ehlinger, known to me, who being by me duly sworn, did depose and say: that he resides in Cedar Rapids, State of Iowa; that he is a Vice President of the UNITED FIRE & CASUALTY COMPANY, the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed pursuant to authority given by the Board of Directors of said corporation and that he signed his name thereto pursuant to like authority, and acknowledges same to be the act and deed of said corporation.



R. G. Heckroth

Notary Public

My commission expires September 30, 1983

CERTIFICATION

I, the undersigned officer of the UNITED FIRE & CASUALTY COMPANY, do hereby certify that I have compared the foregoing copy of the Power of Attorney and affidavit, and the copy of the Section of the By-Laws of said Company as set forth in the Power of Attorney, with the ORIGINALS ON FILE IN THE HOME OFFICE OF SAID COMPANY, and that the same are true and correct transcripts thereof, and of the whole of the said originals, and that the said Power of Attorney has not been revoked and is now in full force and effect.

In testimony whereof I have hereunto subscribed my name and affixed the corporate seal of the said

Company this 24th day of November 1981

AP C-4

Maynard J. Hansen





SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

24 January 1983

CDR Larry Murdock
USCG MSO
360 Louisiana St.
Sturgeon Bay, WI 54235

Dear Sir:

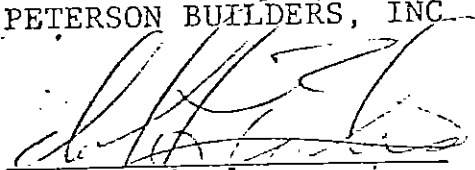
Peterson Builders, Inc., (PBI) has applied to the EPA and DNR for license to operate a hazardous waste storage facility. The facility, located on the West Side at East Walnut Street near Shiloh Road, will be used to store wastes in 55 gallon drums.

In order to comply with EPA regulations, 40 C.F.R. 264, and DNR regulations, NR 181 Sub.V, we are forwarding a copy of our contingency plan.

If you have any comments concerning the plan, please call.

Sincerely yours,

PETERSON BUILDERS, INC.



John L. Beales

JLB/nc

Enclosure

Copy: G. Higgins



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

24 January 1983

Mr. E. B. Mickelson
Door County Memorial Hospital
330 South 16th Place
Sturgeon Bay, WI 54235

Dear Sir:

Peterson Builders, Inc., (PBI) has applied to the EPA and DNR for license to operate a hazardous waste storage facility. The facility, located on the West Side at East Walnut Street near Shiloh Road, will be used to store wastes in 55 gallon drums.

In order to comply with EPA regulations, 40 C.F.R. 264, and DNR regulations, NR 181 Sub. V, we are forwarding a copy of our contingency plan.

If you have any comments concerning the plan, please call.

Sincerely yours,

PETERSON BUILDERS, INC.

John L. Beales

JLB/nc

Enclosure

Copy: G. Higgins



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

24 January 1983

Mr. Mike Nordin
Chief of Police
138 South 4th Avenue
Sturgeon Bay, WI 54235

Dear Sir:

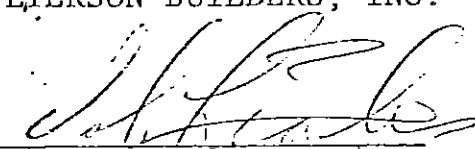
Peterson Builders, Inc., (PBI) has applied to the EPA and DNR for license to operate a hazardous waste storage facility. The facility, located on the West Side at East Walnut Street near Shiloh Road, will be used to store wastes in 55 gallon drums.

In order to comply with EPA regulations, 40 C.F.R. 264. and DNR regulations, NR 181 Sub V, we are forwarding a copy of our contingency plan.

If you have any comments concerning the plan, please call.

Sincerely yours,

PETERSON BUILDERS, INC.


John L. Beales

JLB/nc

Enclosure

Copy: G. Higgins



SHIP DESIGNERS
AND BUILDERS

Peterson Builders, Inc.

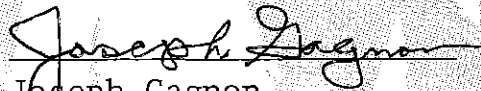
STURGEON BAY, WISCONSIN 54235-0047
101 Pennsylvania Street, P.O. Box 47

(414) 743-5577
TELEX 26-3423

26 January 1983

I, Joseph Gagnon, Vice President and General Manager of Peterson Builders, Inc., a Wisconsin Corporation, in accordance with 40 C.F.R. 122.6 and Section NR 181.55 (3) (b) of the Wisconsin Administrative Code, hereby designate John L. Beales and Gary Higgins to sign, individually, for Peterson Builders, Inc., any certification required by said regulations.

For: PETERSON BUILDERS, INC.

By : 
By : Joseph Gagnon
Vice President

I certify under penalty of law that I have examined and am familiar with the information submitted in the Peterson Builders, Inc., Hazardous Waste Permit Application dated January, 1983 and submitted herewith, and in all attachments thereto, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

For: PETERSON BUILDERS, INC.

By : 
By : John L. Beales

APPENDIX A

HAZARDOUS CHARACTERISTICS OF MATERIALS

HAZARDOUS CHARACTERISTICS OF MATERIALS

TOLUENE - Syns: methylbenzene, phenylmethane, toluol. Colorless liquid, benzol-like odor. Flash point 40° F

It may cause considerable discomfort if inhaled or ingested by mouth. It may cause some skin discomfort which readily disappears after exposure stops. Toluene is derived from coal tar, and commercial grades usually contain small amounts of benzene as an impurity. Acute poisoning, resulting from exposures to high concentration of the vapors, are rare with toluene. Inhalation of 200 ppm of toluene for 8 hours may cause impairment of coordination and reaction time; with higher concentration (up to 800 ppm) these effects are increased and are observed in a shorter time. In the few cases of acute toluene poisoning reported, the effect has been that of a narcotic, the workman passing through a stage of intoxication into one of coma. Recovery following removal from exposure has been the rule.

Exposure to concentration up to 200 ppm produces few symptoms. At 200-500 ppm, headache, nausea, loss of appetite, a bad taste, lassitude, impairment of coordination and reaction time are reported, but are not usually accompanied by any laboratory or physical findings of significance. With higher concentration, the above complaints are increased, and in addition, anemia, leucopenia and enlarged liver may be found in rare cases.

A common air contaminant.

Fire Hazard: Slight, when exposed to heat, flame or oxidizers.

Explosion Hazard: Moderate, when exposed to flame or reacted with sulfuric plus nitric acid, and silver chlorate.

Disaster Hazard: Moderately dangerous; when heated, emits toxic fumes can react vigorously with oxidizing materials.

To Fight Fire: Foam, CO₂, dry chemical.

LACQUERS. Solutions of resins, gums or plastics in an organic solvent.

Flash p: 0°-80° F.

They may cause allergic reactions and are considered common air contaminants.

Fire Hazard: Dangerous, when exposed to heat or flame. A large part of the great fire hazard of lacquers is due to the solvents commonly used.

Explosion Hazard: Severe, in the form of vapor when exposed to flame.

Disaster Hazard: Dangerous. Keep away from heat and open flame; they can react vigorously with oxidizing materials.

Explosive Range: Variable

To Fight Fire: CO₂, dry chemical, water spray.

ETHYL ACETATE. Syns: acetic ether, ethylester, ethyl ethanoate. Colorless liquid, fragrant odor. Flash point 24° F

It may cause skin discomfort which readily disappears after exposure stops. It may cause considerable discomfort when inhaled or ingested by mouth.

Ethyl acetate is irritating to mucus membrane surfaces, particularly the eyes, gums and respiratory passages, and is also mildly narcotic. It can cause skin irritation. High concentrations have a narcotic effect and can cause congestion of the liver and kidneys. Chronic poisoning has been described as producing secondary anemia, leucocytosis and cloudy swelling, and fatty degeneration of the viscera.

Fire Hazard: Dangerous, when exposed to heat or flame; can react vigorously with chlorosulfonic acid.

Explosion Hazard: Moderate, when exposed to flame

Disaster Hazard: Dangerous, upon exposure to heat or flame.

To Fight Fire: CO₂, dry chemical or alcohol foam.

PAINT WASH - EMERGENCY RESPONSE GUIDANCE

FIRE OR EXPLOSION

Will burn. May be ignited by heat, sparks and flames.
Flammable vapor may spread away from spill.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind, keep out of low areas.
Isolate hazard area and deny entry.
Wear self-contained breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank or tankcar is involved in fire.
FOR EMERGENCY ASSISTANCE CALL CHEMTREC (800) 424-9300.
Also, in case of water pollution, call local authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Stay away from ends of tanks
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles.
If this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or discoloration of tank.

SPILL OR LEAK

No flares, smoking or flames in hazard area.

Stop leak if you can do it without risk.

Use water spray to reduce vapors.

Small Spills: Take up with sand, or other noncombustible absorbent materials, then flush area with water.

Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air, call emergency medical care.

If not breathing, give artificial respiration.

If breathing is difficult, give oxygen.

In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.

Remove and isolate contaminated clothing and shoes.

APPENDIX B

INSPECTION LOG SHEETS

PETERSON BUILDERS OPERATING AND STRUCTURAL EQUIPMENT INSPECTION LOG SHEET

Inspector's name/title _____ / _____
 Date of inspection _____ (month/day/year)
 Time of inspection _____ (military time)

Item	Types of problems	status		Date and nature of	
		Acceptable	Unacceptable	Observations	repairs/medical action
Base or foundation	Cracks, spalling, uneven settlement, erosion, wet spots				
Debris and refuse	aesthetics, possible reaction with leaks				
Emergency Equipment	protective clothing absorbants over-pack drums etc.				

PETERSON BUILDERS CONTAINER STORAGE AREA INSPECTION LOG SHEET

Inspector's name/title _____/_____
 Date of inspection _____ (month/day/year)
 Time of inspection _____ (military time)

Item	Types of problems	status		Date and nature of repairs/medical action
		Acceptable	Unacceptable	
Segregation of incompatible wastes	Storage of incompatible wastes in area			
Container placement	Aisle space,			
Sealing of containers	Open lids			
Labeling of containers	Improper identification, date missing			
Containers	Corrosion, leakage structural defects			
Warning signs	Damaged			

APPENDIX C

FINANCIAL MECHANISM



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Lake Michigan District Headquarters
1125 N. Military
Box 3600
Green Bay, WI 54303-1208

Carroll D. Besadny
Secretary

January 11, 1982

File Ref: 4400

Mr. Gary Higgins
Peterson Builders, Inc.
P. O. Box 47
Sturgeon Bay, WI 54235-0047


Dear Mr. Higgins:

Re: Variance Request
Proof of Financial Responsibility
Acknowledgment of Receipt

Copies of the variance request form, EPA Part A application, a closure cost estimate and the proof of financial responsibility instrument for Peterson Builders, Inc., located at 107 East Walnut Street, Sturgeon Bay, Wisconsin, EPA ID #WID096828975, were received by the Wisconsin Department of Natural Resources on September 8, and December 1, 1981. According to your submittal, this facility stores hazardous waste. We will notify you when our review of your submittal is complete, when we plan to inspect your facility and when we approve or disapprove of your request.

If you have any questions regarding this stage of the variance issuance process, please feel free to contact me or Tom Blake at 414-497-4397.

Sincerely,


Douglas C. Rossberg
Solid Waste Coordinator

cc: Systems Management Section - Attn: Wayne Ringquist, SW/3

LEAVE BLANK -- DNR USE ONLY
Regulatory Code
EPA Identification Number
License Number
Name of Licensee
Closure Cost Estimate

KNOW ALL MEN BY THESE PRESENTS, that Peterson Builders, Inc.
(Owner)

of 101 Pennsylvania St., Sturgeon Bay, WI 54235, as Principal, and
(Address)

United Fire & Casualty Company, a surety company organized
(Name of Surety Company)

and existing under the laws of the State of Iowa and duly authorized to do surety business in
the State of Wisconsin, as Surety, are held and firmly bound unto the State of Wisconsin Department of Natural Resources, as

Obligee, in the penal sum of Three Thousand One Hundred Ninety dollars (\$ 3192.70^{-Two and 70/100}*****), for payment of which
the Principal and the Surety bind themselves, their heirs, executors, administrators, successors and assigns, jointly and severally.

WHEREAS, the Principal owns a solid waste land disposal site or hazardous waste facility named _____
located in _____, Town/City/Village of
(Section, Township and Range)

Sturgeon Bay, Door County, Wisconsin, and that site or facility

is subject to either the closure requirements of the plan of operation approval issued by the Obligee, dated this 24th day
of November, 19 81, and any amendments thereto or the closure requirements of sections NR 181.42(8)
and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable to the site or facility.

WHEREAS, section 144.44(3)(c), Wisconsin Statutes, requires that the Principal provide the Obligee with proof of financial
responsibility ensuring that the closure requirements of the plan of operation approval, if any, will be complied with by the
Principal and any successor in interest.

WHEREAS, this bond is written to provide proof of financial responsibility pursuant to section 144.44(3)(c), Wisconsin
Statutes, and section NR 180.15 or NR 181.42(10), Wisconsin Administrative Code, to ensure compliance with the closure
requirements of the plan of operation approval and any amendments thereto or the closure requirements in sections NR
181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and shall inure to the benefit of the
Obligee.

NOW, THEREFORE, the condition of this obligation is such that if the Principal or any successor in interest complies with
the closure requirements of the plan of operation approval and any amendments thereto or the closure requirements in sections
NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and closes the facility identified above
in accordance with these closure requirements then and only then, this obligation shall be void; otherwise, it shall remain in
full force and effect.

The Surety shall become liable on this bond obligation only upon a determination by the Obligee, subject to judicial review,
that the Principal has failed to fulfill the above condition. Following such a determination, the Surety must either complete
closure of the facility in accordance with the plan of operation approval and any amendments thereto or the closure
requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, or pay the
amount of this bond as directed by the Secretary of the Obligee.

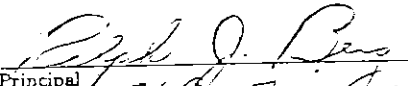
Liability of the Surety shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the full penal sum of this bond, but in no event shall the obligation of the Surety thereunder exceed the full penal sum of this bond. Release or discharge of the Surety shall not release the Principal or any successor in interest from the obligation to fully and completely comply with all closure requirements of the plan of operation approval and any amendments thereto or all closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable. The insolvency or bankruptcy of the Principal shall not constitute a discharge to the Surety with regard to any claim of liability on the obligation of this bond. No amendment to the plan of operation approval will release the Surety from its obligation under this bond.

The Surety hereby waives notification of any failure on the part of the Principal or any successor in interest to faithfully comply with the terms of the plan of operation approval or any amendments thereof or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, and lack of notice from the Obligor will not bar or limit recovery against the Surety.

This bond is effective on the 24th day of November, 19 81, and shall continue in force until terminated as hereinafter provided. As long as any obligation of the owner or any successor in interest for closure in accordance with the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, exists, this bond shall not be cancelled by the Surety unless a replacement bond or other proof of financial responsibility acceptable to the Obligor is provided to the Obligor. If the Surety proposes to cancel this bond, notice shall be provided to the Obligor and the Principal in writing by registered or certified mail not less than 90 days prior to the proposed cancellation date. Not less than 30 days prior to the expiration of the 90 day notice period, the Principal shall deliver to the Obligor a replacement bond or other proof of financial responsibility acceptable to the Obligor. In the absence of the delivery of a replacement bond or other acceptable proof of financial responsibility, all site or facility operations shall immediately cease and this bond shall remain in full force and effect as long as any obligation of the Principal or any successor in interest for closure in accordance with the plan of operation approval and any amendments thereto or the closure requirements in sections NR 181.42(8) and NR 181.44(12) and (13), Wisconsin Administrative Code, if applicable, remains unsatisfied.


Signed, sealed and dated this 24th day of November, 19 81.

PETERSON BUILDERS, INC.


Principal

UNITED FIRE & CASUALTY COMPANY
Surety




Attorney in Fact
Robert J. Stoneman

Bond Number _____



UNITED FIRE & CASUALTY COMPANY
HOME OFFICE - CEDAR RAPIDS, IOWA

CERTIFIED COPY OF POWER OF ATTORNEY

(Original on file at Home Office of Company - See Certification)

NOW ALL MEN BY THESE PRESENTS, That the UNITED FIRE & CASUALTY COMPANY, a corporation duly organized and existing under the laws of the State of Iowa, and having its principal office in Cedar Rapids, State of Iowa, does make, constitute and appoint Robert J. Stoneman, or Patricia J. Schopf, or Peter C. Stoneman, or Francis J. LeRoy, All Individually

of Sturgeon Bay, Wisconsin

its true and lawful Attorney(s)-in-Fact with power and authority hereby conferred to sign, seal and execute in its behalf all lawful bonds, undertakings and other obligatory instruments of similar nature as follows: Any and all bonds in an amount not exceeding Five Hundred Thousand and no/100 (\$500,000.00) Dollars

and to bind UNITED FIRE & CASUALTY COMPANY thereby as fully and to the same extent as if such instruments were signed by the duly authorized officers of UNITED FIRE & CASUALTY COMPANY and all the acts of said Attorney, pursuant to the authority hereby given are hereby ratified and confirmed.

The Authority hereby granted shall expire November 29, 1982 unless sooner revoked.

This power of Attorney is made and executed pursuant to and by authority of the following By-Law duly adopted by the Board of Directors of the Company on April 18, 1973.

"Article V - Surety Bonds and Undertakings."

Section 2. Appointment of Attorney-in-Fact. "The President or any Vice President, or any other officer of the Company, may, from time to time, appoint by written certificates attorneys-in-fact to act in behalf of the Company in the execution of policies of insurance, bonds, undertakings and other obligatory instruments of like nature. The signature of any officer authorized hereby, and the Corporate seal, may be affixed by facsimile to any power of attorney or special power of attorney or certification of either authorized hereby; such signature and seal, when so used, being adopted by the Company as the original signature of such officer and the original seal of the Company, to be valid and binding upon the Company with the same force and effect as though manually affixed. Such attorneys-in-fact, subject to the limitations set forth in their respective certificates of authority shall have full power to bind the Company by their signature and execution of any such instruments and to attach the seal of the Company thereto. The President or any Vice President, the Board of Directors or any other officer of the Company may at any time revoke all power and authority previously given to any attorney-in-fact.

IN WITNESS WHEREOF, the UNITED FIRE & CASUALTY COMPANY has caused these presents to be signed by its vice president and its corporate seal to be hereto affixed this 29th day of November, A.D. 1980.

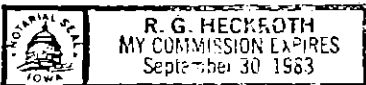


UNITED FIRE & CASUALTY COMPANY

By *Richard J. Ehlinger*
Vice President

State of Iowa, County of Linn, ss:

On this 29th day of November 1980, before me personally came Richard J. Ehlinger to me known, who being by me duly sworn, did depose and say: that he resides in Cedar Rapids, State of Iowa; that he is a Vice President of the UNITED FIRE & CASUALTY COMPANY, the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed pursuant to authority given by the Board of Directors of said corporation and that he signed his name thereto pursuant to like authority, and acknowledges same to be the act and deed of said corporation.



R. G. Heckroth

Notary Public

My commission expires September 30, 1983

CERTIFICATION

I, the undersigned officer of the UNITED FIRE & CASUALTY COMPANY, do hereby certify that I have compared the foregoing copy of the Power of Attorney and affidavit, and the copy of the Section of the By-Laws of said Company as set forth in the Power of Attorney, with the ORIGINALS ON FILE IN THE HOME OFFICE OF SAID COMPANY, and that the same are true and correct transcripts thereof, and of the whole of the said originals, and that the said Power of Attorney has not been revoked and is now in full force and effect.

In testimony whereof I have hereunto subscribed my name and affixed the corporate seal of the said

Company this 24th day of November 1981

AP C-4

Maynard J. Hansen



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

Name of Permittee: Peterson Builders, Inc.
Facility Location: 107 E. Walnut, Sturgeon Bay, Wisconsin
EPA Identification Number: WID096328975
Effective Date: _____
Expiration Date: (This permit will have a 10 year duration)

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to Peterson Builders, Inc. (hereafter called the Permittee), to operate a hazardous waste storage facility located in Sturgeon Bay, Wisconsin at latitude 44° 49' and longitude 87° 22'. You are authorized to conduct the following hazardous waste management activities:

<u>X</u> Storage	_____ Treatment	_____ Disposal
<u>X</u> Container	_____ Tank	_____ Injection Well
_____ Tank	_____ Surface Impoundment	_____ Landfill
_____ Waste Pile	_____ Incinerator	_____ Land Application
_____ Surface Impoundment	_____ Other	_____ Ocean Disposal
		_____ Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

<u>X</u> 261	<u>X</u> 264, Subpart G	_____ 264, Subpart L
<u>X</u> 262	<u>X</u> 264, Subpart H	_____ 264, Subpart M
<u>X</u> 264, Subparts A-E	<u>X</u> 264, Subpart I	_____ 264, Subpart N
_____ 264, Subpart F	_____ 264, Subpart J	_____ 264, Subpart O
	_____ 264, Subpart K	<u>X</u> 270

Permit Approval

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated January 20, 1983, and any subsequent amendments (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

Issued this _____ day of _____

by _____
Basil G. Constantelos, Director
Waste Management Division

ADDENDUM to STATEMENT of BASIS

- A. The permit for Peterson Builders, Inc. is being modified to allow a increase in storage capacity from 50 to 100 55 gallon drums. This will allow a more cost effective mode of disposal. Additionally, in an effort to minimize the volume and hazards of wastes, PBI is adding another non-halogenated solvent to their list of waste streams. Appropriate changes to the cost of closure and bond have also been performed.

STATEMENT OF BASIS

PETERSON BUILDERS, INC.
WID 096828975

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR 124.7 (Title 40 of the Code of Federal Regulations, Section 124.7, the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

Peterson Builders, Inc. is primarily a manufacturer of large boats and ships. In addition PBI manufactures trucks used in the air transport industry. Hazardous wastes are generated by the clean-up of metal painting equipment and fibreglassing tools. Various halogenated and non-halogenated solvents are used in these clean-up operations. The wastes are stored in 55 gallon drums for varying periods of time, and are eventually transported off site for recycling. No more than 50 drums are stored in the storage area at any one particular point in time.

B. PERMIT APPLICATION

The permit application cited herein is the January 20, 1983, permit application, as amended on June 7, 1983, and September 13, 1983.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable hazardous waste management requirements under the Resource Conservation and Recovery Act (RCRA). The U.S. EPA is required to prepare the draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR §124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to U.S. EPA taking any final permitting action on the application for a hazardous waste management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions the permit will become effective immediately upon issuance of the permit. If comments received during the comment period requested changes in the draft permit conditions when the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Permit will be coordinated by both U.S. EPA and the Wisconsin Department of Natural Resources (WDNR). At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
I. STANDARD CONDITIONS		
I.A.	Effect of Permit	§270.4 & 270.30(g)
I.B.	Permit Actions	§270.30(f), 270.41, §270.42, 270.43, §264.112 & 264.343(d)
I.C.	Severability	Standard Practice
I.D.1.	Duty to Comply	§270.30(a)
I.D.2.	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3.	Permit Expiration	§270.51
I.D.4.	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5.	Duty to Mitigate	§270.30(d)
I.D.6.	Proper Operation and Maintenance	§270.30(e)
I.D.7.	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8.	Inspection and Entry	§270.30(i)
I.D.9.	Monitoring and Records	§270.30(j)
I.D.10.	Reporting Planned Changes	§270.30(1)(1)
I.D.11.	Certification of Construction or Modification	§270.30(1)(2)
I.D.12.	Anticipated Noncompliance	§270.30(1)(2)
I.D.13.	Transfer of Permits	§270.30, (1)(3), 270.40 & 264.12(c)
I.D.14.	Compliance Schedules	§270.30(1)(5) & 270.33
I.D.15.	Twenty-Four Hour Reporting	§270.30(1)(6) & 264.56 (d)(i)(j)
I.D.16.	Other Noncompliance	§270.30(1)(10)

<u>Permit Conditions</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
I.D.17.	Other Information	§270.30(1)(11)
I.E.	Signatory Requirement	§270.11 & 270.30(k)
I.F.	Confidential Information	§270.12
I.G.	Documents to be Submitted Prior to Operation	As Indicated in Draft Permit
I.H.	Documents to be Maintained at Facility Site	§264.13(b), 264.16(d) §264.53(a), 264.122(a) §264.142(a), 264.73, §264.15(b)
II. GENERAL FACILITY CONDITIONS		
II.A.	Design and Operation of Facility	§264.31
II.B.	Required Notice	§264.12
II.C.	General Waste Analysis	§264.13
II.D.	Security	§264.14
II.E.	General Inspection Requirements	§264.15
II.F.	Personnel Training	§264.16
II.G.	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H.	Location Standards	§264.18
II.I.1.	Required Equipment	§264.32
II.I.2.	Testing and Maintenance of Equipment	§264.33
II.I.3.	Access to Communications or Alarm System	§264.34
II.I.4.	Required Aisle Space	§264.35
II.I.5.	Local Authorities	§264.37
II.J.1.	Implementation of Contingency Plan	§264.51
II.J.2.	Copies of the Contingency Plan	§264.53
II.J.3.	Amendments to Contingency Plan	§264.54

<u>Permit Conditions</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II. GENERAL CONDITIONS (continued)		
II.J.4.	Emergency Coordinator	§264.55
II.K.	Manifest System	§264.71, §264.72, §264.76, §270.30(1)(7) §270.30(1)(8)
II.L.1	Operating Record	§264.73
II.L.2.	Biennial Report	§264.75, §270.30(1)(9)
II.M.1.	Closure Performance Standard	§264.111
II.M.2.	Amendment to Closure Plan	§264.112(b)
II.M.3.	Notification of Closure	§264.112(c)
II.M.4.	Time Allowed for Closure	§264.113
II.M.5.	Disposal or Decontamination of Equipment	§264.114
II.M.6.	Certification of Closure	§264.115
I.N.	Closure Cost Estimate	§264.142
II.O.	Financial Assurance for Facility Closure	§264.143
II.P.	Liability Requirements	§264.147
II.Q.	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148
III. STORAGE CONTAINERS		
III.A.	Waste Identification	§270.13(i)
III.B.	Condition of Containers	§264.171
III.C.	Compatibility of Wastes with Containers	§264.172
III.D.	Management of Containers	§264.173
III.E.	Containment	§264.175
III.F.	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G.	Special Requirements for Incompatible Waste	§264.177

The permit modifications for Peterson Builders, Inc. basically consists of the following items:

1. Adding a new waste, U028, otherwise known as Bis(2-ethylhexyl)phthalate. This is reflected several places in the permit, such as condition A.4, page 11 of 11, under Waste Identification; and Section C-2 and Table I of the Waste Analysis Plan.
2. PBI has begun operation of a solvent still to recover solvents. Since this procedure has changed the volumes of Hazardous Wastes F002 and F003, these changes are reflected in the paragraph that discusses the recycling procedure in the Contingency Plan (labeled I-C-old sheet attached).
3. PBI, as a result of this still, must have these still bottoms (F002, F003) incinerated. An increase in the closure bond to reflect this cost, as well as an increase in storage capacity to 100 barrels, is shown on Closure Cost Estimate.
4. The Secondary Containment System Design and operation has been changed to show the increased storage capacity.

C-2 Waste Analysis Plan

C-2a Parameters

The hazardous waste stream generated from the paint equipment cleanup will be analyzed for toluene, butyl acetate cellosolve acetate and flash point.

The hazardous waste stream generated from the fiberglass equipment cleanup will be analyzed for acetone, methyl ethyl ketone, methylene chloride, Bis(2-ethylhexyl)phthalate, Extraction Procedure (EP) and flash point.

C-2b Test methods

Table 1 shows the test methods that are used to measure analytical parameters.

C-2c Sampling methods

Table II lists the hazardous wastes stored at the facility and the methods used to sample each.

C-2d Frequency of analysis

Waste from the fiberglass cleanup operation will be analyzed when it is initially generated.

Reanalysis of the two hazardous waste streams will occur once every two years, or if there is reason to believe the waste characteristics have changed.

C-2e Additional requirements for wastes generated off-site

Although this facility handles off-site generated wastes these wastes are generated only at PBI facilities in close proximity to the storage facility. No wastes are accepted from off-site facilities which are either not owned or not operated by PBI. Responsibility for analysis and labelling at the generating facility is taken by the same persons who will be responsible for storage at the storage facility. Accurate test records and labelling at the generating facility render testing by the storage facility unnecessary.

TABLE I

Parameters and Test Methods

<u>Parameter</u>	<u>Test Method</u>	<u>Reference</u>
Flash Point	Pensky-Martens closed cup	ASTM D-93-79 or D-93-80
Toluene	GC/MS	Method 8240 (1)
Methylene Chloride	GC/MS	Method 8240 (1)
Butyl Acetate	GC/MS	Method 8270 (1)
Cellosolve Acetate	GC/MS	Method 8270 (1)
Acetone	GC/MS	Method 8270 (1)
Methyl Ethyl Ketone	GC/MS	Method 8015 (1)
Bis(2-ethylhexyl)phthalate	GC	Method 8060 (1)
Bis(2-ethylhexyl)phthalate	Extraction Procedure (EP) for Barium	Method 1310 (1)

Note:

- (1) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 2nd Edition, U.S.EPA, July 1982, SW-846.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

1. EPA Hazardous Waste No. F002 which includes the following spent halogenated solvents used in degreasing: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1 trichloroethane, chlorobenzene, 1,1,2 trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, and trichlorofluoromethane;
2. EPA Hazardous Waste No. F003 which includes the following spent non-halogenated solvents used in degreasing: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol;
3. EPA Hazardous Waste No. F-005 which includes the following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, and pyridine.
4. EPA Hazardous Waste No. U028 which corresponds to Bis(2-ethylhexyl) phthalate

B. Container Storage Capacity

The Permittee shall not exceed a maximum storage inventory of 100 55-gallon drums or 5500 gallons.

C. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

D. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172.

E. Management of Containers. The Permittee shall manage container as required by 40 CFR §264.173.

F. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR §264.175 as specified in the attached plans and specifications, Attachment VII.

G. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable waste within 15 meters (50 feet) of the facility's property line.

To avoid the possibility of groundwater contamination, PBI tracks the solvents to their final destination. Solvents are collected in specially labeled and numbered barrels. Records are kept on each barrel as it moves from the shipyard to the storage warehouse to disposal. In most cases, either PBI or some other facility recycles these wastes. PBI has them recycled to avoid creating dumps or polluting the air through burning.

I-C. Firefighting Equipment, Spill Cleanup Equipment and Alarms

1. Firefighting Equipment

- a. A B-II dry chemical fire extinguisher is located near the warehouse door.
- b. Two (2), hard hats and spray shields are in the safety locker.
- c. A portable first aid kit is in the safety locker.

2. Spill Equipment

- a. A 150 foot roll of 3M Sorbent and two (2) 50 pound bags of Sorbent are next to the safety locker. Sorbent can be used to dam or soak up spills.
- b. Two (2) pair of rubber gloves and boots, hard hats, spray shields and disposable coveralls are in the safety locker.
- c. Oversize drums (at least three) are next to the safety locker. Oversize drums can be placed around leaking drums.
- d. Two (2) five gallon/minute hand pumps are next to the safety locker. Hand pumps can be used for emptying drums or pumping out contained spills.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

Name of Permittee: Peterson Builders, Inc.
Facility Location: 107 E. Walnut, Sturgeon Bay, Wisconsin
EPA Identification Number: WID 096 828 975
Effective Date: August 6, 1984
Expiration Date: August 6, 1994

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA (codified and to be codified in Title 40 of the Code of Federal Regulations)), a permit is issued to Peterson Builders, Inc. (hereafter called the Permittee), to operate a hazardous waste storage facility located in Sturgeon Bay, Wisconsin at latitude 44° 49' and longitude 87° 22'. You are authorized to conduct the following hazardous waste management activities:

<u>X</u> Storage	<u> </u> Treatment	<u> </u> Disposal
<u>X</u> Container	<u> </u> Tank	<u> </u> Injection Well
<u> </u> Tank	<u> </u> Surface Impoundment	<u> </u> Landfill
<u> </u> Waste Pile	<u> </u> Incinerator	<u> </u> Land Application
<u> </u> Surface Impoundment	<u> </u> Other	<u> </u> Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

<u>X</u> 261	<u>X</u> 264, Subpart G	<u> </u> 264, Subpart L
<u>X</u> 262	<u>X</u> 264, Subpart H	<u> </u> 264, Subpart M
<u>X</u> 264, Subparts A-E	<u>X</u> 264, Subpart I	<u> </u> 264, Subpart N
<u> </u> 264, Subpart F	<u> </u> 264, Subpart J	<u> </u> 264, Subpart O
	<u> </u> 264, Subpart K	<u>X</u> 270

Permit Approval


The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

095-36

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated January 20, 1983, and any subsequent amendments (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

Issued this 6th day of August, 1984

by


Basil G. Constantelos, Director
Waste Management Division

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR §270.41, §270.42, and §270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than non-compliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires.
3. Permit Expiration. The duration of this permit shall be ten years from the effective date of the permit, in conformance with the provisions of 40 CFR §270.50. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR §270.13 - §270.29) and through no fault of the Permittee, the Regional Administrator has not issued a new permit as set forth in 40 CFR §124.15.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate methods from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846 Second Edition, U.S. EPA, Standard Methods of Wastewater Analysis, EPA-600/4-79-020, U.S. EPA; or an equivalent method as specified in the attached Waste Analysis Plan.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of monitoring information shall specify:
 - (i) The dates, exact place, and time of sampling or measurements;
 - (ii) The individual(s) who performed the sampling or measurements;
 - (iii) The date(s) analyses were performed;

- (iv) The individual(s) who performed the analyses;
 - (v) The results of such analyses.
10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.
11. Certification of Construction or Modification. The Permittee may not commence storage of hazardous waste at the facility until:
- (a) The Permittee has submitted to the Regional Administrator by certified mail or hand delivery a letter signed by the Permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
 - (b)
 - (i) The Regional Administrator has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
 - (ii) The Regional Administrator has either waived the inspection or has not within 15 days notified the Permittee of his or her intent to inspect.
12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR §270.41(b)(2) or §270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
14. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
- (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;
 - (iii) Date, time, and type of incident;
 - (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

- 16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in condition D.15.
- 17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.

E. SIGNATORY REQUIREMENT

All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR §270.11.

F. CONFIDENTIAL INFORMATION

The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR §270.12.

G. DOCUMENTS TO BE SUBMITTED PRIOR TO OPERATION

This section does not apply.

H. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

- (1) Waste analysis plan as required by 40 CFR §264.13 and this permit.
- (2) Inspection schedules as required by 40 CFR §264.16(d) and this permit.
- (3) Contingency plan as required by 40 CFR §264.53(a) and this permit.
- (4) Closure plan as required by 40 CFR §264.112(a) and this permit.
- (5) Cost estimate for facility closure as required by 40 CFR §264.142(d) and this permit.
- (6) Operating record as required by 40 CFR §264.73 and this permit.
- (7) Personnel training documents and records as required by 40 CFR §264.15(b) and this permit.

II. GENERAL FACILITY CONDITIONS

- A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- B. Required Notice.
1. The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.
 2. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).
- C. General Waste Analysis.
1. The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment I.
- D. Security. The Permittee shall comply with the security provisions of 40 CFR §264.14(b)(1) and (c).
- E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR §264.15(c). Records of inspections shall be kept as required by 40 CFR §264.15(d).
- F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).
- G. General Requirements for Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR §264.17(a) as they pertain to ignitable waste.
- H. Location Standards. This section does not apply.

I. Preparedness and Prevention

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV as required by 40 CFR §264.32.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR §264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by §40 CFR 264.35.
5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR §264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. Contingency Plan.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR §264.56 whenever there is constituent which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR §264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, in accordance with 40 CFR §264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR §264.55, concerning the emergency coordinator.

- K. Manifest System. The Permittee shall comply with the manifest requirements of 40 CFR §264.71, §264.72, and §264.76.

L. Recordkeeping and Reporting.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), and (8).
2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR §264.75.

M. Closure.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR §264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.
4. Time Allowed For Closure. Within 90 days after receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities within 180 days after receiving the final volume of waste and in accordance with the schedule specified in the closure plan, Attachment V.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR §264.114 and the closure plan, Attachment V.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR §264.115.

N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR §264.142(a), is specified in Attachment VI.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR §264.142(b).
2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR §264.142(c).
3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR §264.142(d).

O. Financial Assurance for Facility Closure.

1. The Permittee shall demonstrate continuous compliance with 40 CFR §264.143 by providing documentation of financial assurance, as required by 40 CFR §264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR §264.143.

2. Where the requirements of 40 CFR 264.143 are met through the use of State-required mechanisms pursuant to 264.149, documentation shall be made out to the Wisconsin Department of Natural Resources. Copies shall be submitted to U.S. EPA, Region V office.

P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR §264.147 and the documentation requirements of 40 CFR §264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. STORAGE IN CONTAINERS

A. Waste Identification. The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit:

1. EPA Hazardous Waste No. F002 which includes the following spent halogenated solvents used in degreasing: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1 trichloroethane, chlorobenzene, 1,1,2 trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, and trichlorofluoromethane;
2. EPA Hazardous Waste No. F003 which includes the following spent non-halogenated solvents used in degreasing: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol;
3. EPA Hazardous Waste No. F005 which includes the following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, and pyridine.

B. Container Storage Capacity

The Permittee shall not exceed a maximum storage inventory of 50 55-gallon drums or 2750 gallons.

C. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

D. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR §264.172.

E. Management of Containers. The Permittee shall manage containers as required by 40 CFR §264.173.

F. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR §264.175 as specified in the attached plans and specifications, Attachment VII.

G. Special Requirements for Ignitable or Reactive Waste. The Permittee shall not locate containers holding ignitable waste within 15 meters (50 feet) of the facility's property line.

Attachment I
Waste Analysis Plan

095-38

C-2 Waste Analysis Plan

C-2a Parameters

The hazardous waste stream generated from the paint equipment cleanup will be analyzed for toluene, butyl acetate, cellosolve acetate and flash point.

The hazardous waste stream generated from the fiberglass equipment cleanup will be analyzed for acetone, methyl ethyl ketone, methylene chloride and flash point.

C-2b Test methods

Table I shows the test methods that are used to measure analytical parameters.

C2c Sampling methods

Table II lists the hazardous wastes stored at the facility and the methods used to sample each.

C-2d Frequency of analysis

Waste from the fiberglass cleanup operation will be analyzed when it is initially generated.

Reanalysis of the two hazardous waste streams will occur once every two years, or if there is reason to believe the waste characteristics have changed.

C-2e Additional requirements for wastes generated off-site

Although this facility handles off-site generated wastes these wastes are generated only at PBI facilities in close proximity to the storage facility. No wastes are accepted from off-site facilities which are either not owned or not operated by PBI. Responsibility for analysis and labelling at the generating facility is taken by the same persons who will be responsible for storage at the storage facility. Accurate test records and labelling at the generating facility render testing by the storage facility unnecessary.

Table I
Parameters and Test Methods

<u>Parameter</u>	<u>Test Method</u>	<u>Reference</u>
Flash Point	Pensky-Martens closed cup	ASTM D-93-79 or D-93-80
Toluene	GC/MS	Method 8240 (1)
Methylene Chloride	GC/MS	Method 8240 (1)
Butyl Acetate	GC/MS	Method 8270 (1)
Cellosolve Acetate	GC/MS	Method 8270 (1)
Acetone	GC/MS	Method 8270 (1)
Methyl Ethyl Ketone	GC/MS	Method 8015 (1)

Note:

- (1) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 2nd Edition, U.S. EPA, July 1982, SW-846.

Table II

Methods Used to Sample Hazardous Wastes

Hazardous Waste	Sampling Method	Description of Sampling
Solvents from paint equipment clean-up operations	Method 1.2.1.1 (1)	Composite sample using a coliwasa from a random selection of individual containers.
Solvents from fiberglass equipment clean-up operations	Method 1.2.1.1 (1)	Composite sample using a coliwasa from a random selection of individual containers.

Note:

- (1) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, 2nd Edition, U.S. EPA, July 1982, SW-846.

Attachment II
Inspection Schedule

095-38

F-1a(3) Warning signs

Signs which are legible from a distance of 25 feet are posted at all entrances to the facility. These signs are visible from all angles of approach and bare the legend "Danger - Unauthorized Personnel Keep Out". Also, "No Smoking" signs are legible for a distance of 25 feet and have been placed in the container storage area.

F-1b Waiver

Peterson Builders, Inc. does not request a waiver of the requirements stated in Part 264.14(a)(1) and (2) regarding injury to intruder and violation by intruder.

F-2 Inspection Schedule

F-2a General inspection requirements

Peterson Builders Incorporated conducts regular inspections of the facility for equipment malfunctions, structural deterioration, operator errors, and discharges that could cause or lead to the release of hazardous constituents and adversely affect the environment or threaten human health.

F-2a(1) Types of problems

Table 2 represents the schedule for inspecting monitoring equipment, safety and emergency equipment, security devices,

PETERSON INSPECTION SCHEDULE

Area/equipment	Specific item	Types of problems	frequency of inspection
Operating and structural equipment	Bases or foundation	Erosion; uneven settlement; cracks and spalling in concrete pads, base rings and piers; deterioration of water seal between tank bottom and foundation, wet spots	Weekly
	Base or Foundation	Cracks, spalling, uneven settlement, erosion, wet spots	Weekly
Container Storage Area	Locks	aesthetics, possible reaction with leaks	Weekly
	Debris and refuse	Damaged (e.g., broken wood, warping, nails missing)	Weekly
	Pallets	Storage of incompatible wastes in area	Weekly
	Segregation of incompatible wastes		Weekly
	Container placement	Aisle space	Weekly
	Sealing of containers	Open lids	Weekly
	Labeling of containers	Improper identification, date missing	Weekly
	Containers	Corrosion, leakage, structural defects	Weekly
	Ramps	Cracks, spalling, uneven settlement, erosion	Weekly
	Warning signs	Damaged	Weekly
Emergency Response Equipment	Protective clothing, absorbants, overpack drums, etc. <i>Extinguishers</i>	Contents in order and usable	Monthly

operating and structural equipment, and the container storage area. The items listed in the table are considered because of their role in preventing, detecting, or responding to environmental or human health hazards. Provided with each item is a list of problems normally encountered.

F-2a(2) Frequency of inspection

Also provided in Table 2 is a recommended frequency of inspection for each item.

F-2b Specific process inspection requirements

F-2b(1) Container inspection

Inspections of the container storage area will be conducted per the inspection schedule provided in Table 2. Results of each inspection will be recorded on inspection log sheets entitled "Operating and structural equipment inspection log sheet", "Security devices inspection log sheet" and "Container storage area inspection log sheet" (Appendix B). Information requested on the log sheets includes the inspector's name and title, date and time of inspection, item of inspection, typical problems encountered, status of the item, observations, and the date and nature of repairs of remedial action. Typical problems encountered with each item of inspection, included in the inspection

Date: 1/20/83

Revision: 1

F

schedule, are provided on the log sheet to serve as a reminder to the inspector and to insure a complete inspection. The inspector is required to check the status of each item and indicate whether its condition is acceptable or unacceptable. Special attention is given to the number of containers, aisle space, and more. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action.

F-2(c) Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time in between inspections, remedial action will be taken immediately. PBI personnel will notify the appropriate authorities per the contingency plan (See Section G) and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the contingency plan for further details.

F-2(d) Inspection Log

An inspection log is maintained for each calendar year in a three ring binder. After an inspection, the log sheets are filed in the binder which provides a case history of a particular item. The inspection log book is always kept with the inspection schedule in the storage building. As required, records of inspections are kept for at least 3 years from the date of inspection.

~~F-3 Waiver of preparedness and prevention requirements~~

~~PBI does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR Part 264, Subpart C. Requirements of this part are primarily addressed in Section D, Section F, and Section G of this application.~~

~~F-3a Equipment requirements~~

~~Internal and external communications, emergency equipment, and fire control equipment are discussed in Section F and Section G.~~

~~F-3b Aisle space requirements~~

~~Aisle space requirements are addressed in Section D-1a(2).~~

Attachment III
Training Program

095-38

SECTION H

TRAINING PROGRAM

EMPLOYEE TRAINING PROGRAM

LESSON NO. 1

EMERGENCY RESPONSE IN EVENT

OF FIRE OR EXPLOSION

Lesson No. 1

EMERGENCY RESPONSE IN EVENT OF FIRE OR EXPLOSION

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

Coverage: 40 CFR, Parts 264-265

TOPICS DISCUSSED:

Subpart D, Section 265.50 through 265.56

1. General discussion and coverage of Subpart D.

Overall coverage of types of fires and kinds of equipment pertaining to and relating to our facility operation.

I. Three types of fires are wood, electrical, and chemical.

A. A wood fire is classified as combustible.

1. To control, use water to quench or cool fire. A dry powder chemical may also be used effectively.

B. A chemical fire is caused from vapor air mixture over flammable liquids igniting.

1. To control, use dry chemical powder (preferred), also can use foam, vapor liquid, or water fog spray depending on circumstances.

C. Electrical fires usually start through short-circuiting or overload on line, etc.

1. To control, use only non-conductive dry chemicals or carbon dioxide

II. Flammable Liquids: The Four Characteristics

A. Fire point - lowest temperature that a flammable air vapor mix will ignite without spark or flame.

B. Flash point - lowest temperature that liquid gives off enough vapors to ignite.

C. Ignition temperature - temperature that a flammable vapor air mix will burn without ignition.

- D. Flammable or explosive range - the range between the smallest and largest amount of vapor in a given quantity of air which will explode or burn when ignited.

III. Classification

- A. The proper classification of fire is of vital importance as it determines the way the fire must be put out.

IV. Elements

- A. There are three elements needed to make a fire burn. They are:
1. Heat - to stop fire, remove the heat.
 2. Fuel - to stop fire, remove the fuel.
 3. Oxygen - to stop fire, remove the oxygen or stop the reaction.

V. Prevention

- A. An effective in-plant fire protection plan depends on two things. They are:
1. Knowledgeable personnel
 2. The correct and sufficient amount of fire fighting equipment (Sec. 264.32).

VI. Instructions

- A. The proper way to use dry powder extinguishers.
- B. In event of fire, take action as prescribed (40 CFR 264.56) in company emergency response program.
- C. Learn how and when to use intercom or telephone for emergency.
- D. Who to call? Fire department first? Coordinator first?
- E. How to identify characteristics of fire and type and danger involved.
- F. What's involved? Drums, tanks, equipment, electricity? or solvent spill?
- G. Should emergency switches (electric) be shut off?
- H. Is fire controllable or uncontrollable?
- I. What are the coordinators duties?

- J. Orderly evacuation in case of fire.
- K. Caution on how and when to use water to fight fire.
- L. What to do if you have a victim.

VII. Coordinator

- A. Emergency coordinator will direct and assess the possible hazards to human health and life or environment and take needed steps to protect life and property, inform proper authorities, attempt to contain the fire, save property and records, call for evacuation.

TEST: LESSON NO. I

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. Name three types of fires.
2. What is their classification using A.B.C.?
3. Name three kinds of fire fighting equipment.
4. Name three kinds of agents used to fight fires.
5. What kind of fire is each used for?
6. What are the first three things you should do if you sight a fire?
7. Name the locations of emergency power shut-off switches.
8. How many are there?
9. Explain the difference between a controllable fire and an uncontrollable fire.
10. What is the procedure for giving an alarm?
11. Where are emergency phone numbers listed?
12. On the three plot plans showing location of buildings, grounds, etc., fill in the location of each of the following, using the signs given:

Plot Plan #1

- * Emergency electric power shut-off.
- X Phones for emergency alarm system.
- ? Mobil (dry powder) fire extinguisher.
- () Portable hand held extinguishers.

Plot Plan #2

- * Fire hose (box)
- X Water hydrant
- ? First aid station
- () Emergency showers & eye wash

EMPLOYEE TRAINING PROGRAM

LESSON, NO. 2

EMERGENCY RESPONSE IN EVENT OF A

RELEASE OF HAZARDOUS WASTE

Lesson No. 2

EMERGENCY RESPONSE IN THE EVENT OF A RELEASE OF A HAZARDOUS WASTE

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

TOPIC DISCUSSED

General instructions covering 40 CFR, 264.16.

All employees are required to become familiar with and to learn the location of all in-plant emergency equipment, e.g. shovels, sand, pumps, hoses, fire extinguishers, absorbent bags, etc.

- I. Emergency procedure as programmed for our facility in event of a spill or release of a hazardous substance.
 - A. Try to identify the character of the spill or release as instructed in Lesson No. 1.
 - B. Identify the source, amount and real extent of release.
 - C. You must notify your emergency coordinator (via intercom if necessary) and your immediate supervisor.
 - D. Standby with all necessary fire equipment in case of an ignition.
 - E. Suspend all operations until spill (as in case of a ruptured drum of flammables) is cleaned up and vapors have dissipated.
 - F. Don't allow spill to escape from paved area onto ground area, dike if necessary.
 - G. Don't allow any vehicle to operate in close proximity of spill (because of possible ignition) until cleaned up.
 - H. Procedures to follow if ground has been contaminated follow Sec. 264.56(g).
 - I. Reporting when clean-up is finished if necessary.
 - J. All instructions have covered events typical of and pertinent to our operation; e.g., flammable solvents.

II. Hazardous Waste Discharge in Transit

- A. A hazardous waste discharge is defined as the accidental, or intentional spilling, leaking, pumping, pouring, emitting, or dumping of a hazardous waste onto land or water.

III. For a Discharge in Transit

In most cases, the State Police or Highway Patrol will be the first to arrive on the scene of an accident, and the driver will give them the emergency telephone numbers of those people or agencies whom he wishes to contact. The law requires that the driver remain at the scene and keep his vehicle within his sight.

A. Action required.

1. Take immediate action to protect human health and environment.
2. Put out all necessary approved warning signs for traffic. If vehicle is placarded combustible or flammable, driver must not allow anyone to use road flares or smoke.
3. Notify the local authorities as soon as possible. Arrange to have someone call the National Response Center.
4. Dike the area if necessary, to prevent run-off into drain lines or waterways.
5. Cooperate with local authorities as to identification of material utilizing manifest, shipping papers, etc.
6. If necessary call Chem Trec at 1-800-424-9300.

B. Clean-Up

1. Transporter is responsible for clean-up.

C. Reference

1. Federal Register, May 19, 1980 (45 FR, 33150-33152) 40 CFR, 261.31.

IV. Hazardous Waste Discharge

A. Procedure

1. Keep in mind throughout training that of utmost importance is action No. 1, which is to take

immediate action to protect human health and
environment

2. National Emergency Response Center 1-800-424-8802.

TEST: LESSON NO. 2

Instructor _____
ite _____

Employee's
name _____
Grade _____

Job
classification _____

1. What is the most important thing to remember in case of a spill or release of hazardous waste?
2. Name the emergency coordinator for response.
3. Do you need to manifest any earth (soil) that has been contaminated from a spill and removed?
4. In event of a spill, is it necessary to shut-off all ignition sources?
5. What type of personal safety equipment is used when cleaning up a spill?
6. If you had to evacuate, would you be able to do so without indecision?
7. Where is the closest phone in relationship to your work area?
8. Name three kinds of flammable solvents.
9. What is the name of the person in your area with CPR and Red Cross training?
10. Should you fill out a spill report for five gallons or less spilled?
11. Name three actions needed for an in-plant emergency response for a release of hazardous waste; e.g., a drum of flammable liquid ruptures while loading.
12. Are vapors harmful?
13. What method do we use as an alarm for emergency response?
14. Where is the closest exit from your work area?

15. What is meant by the character of the release?

16. If you had a spill or release of hazardous waste while in transit, which one of these authorities would you call first, second, third, etc. (a) highway patrol, (b) plant emergency coordinator, (c) National Emergency Response Center, (d) fire department.

EMPLOYEE TRAINING PROGRAM

Lesson No. 3

NEW FEDERAL & STATE RULES, REGULATIONS FOR

THE GENERATOR, TRANSPORTER & TREATMENT

STORAGE OR DISPOSAL OF HAZARDOUS WASTE

- RCRA -

- EPA -

- DOT -

STATE AGENCY

NEW FEDERAL & STATE HAZARDOUS RULES & REGULATION

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

TOPIC DISCUSSED

EPA - Environmental Protection Agency
DOT - Department of Transportation
STATE AGENCY - States new rules that apply

A. Direct impact - 49 CFR, Sec. 172.205(a)

1. No person may offer for transportation, transport, transfer, or deliver a hazardous waste, unless a hazardous waste manifest is prepared, signed, carried and given as required of that person by this section.

B. Direct impact - 40 CFR, Sec. 262.12

1. A generator must not treat, store, dispose of, transport or offer for transportation, hazardous waste without having received an EPA identification number from the administrator.
2. A generator must not offer his hazardous waste to transporters, treatment, storage, or disposal facilities that have not received an identification number from EPA.

C. Other agencies

FHA - Federal Highway Administration
BMCS - Bureau of Motor Carrier Safety
MTB - Material Transportation Bureau
USCG - United States Coast Guard
NFPA - National Fire Protection Agency
TSSC - Toxic Substances and Strategy Committee

TEST: LESSON NO. 3

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. Who is EPA? Give their full name.
2. Who is DOT? Give their full name.
3. What is their function?
4. How are the two related?
5. Explain the "cradle-to-the-grave theory".
6. What is the minimum fine for a violation?
7. What does TSD stand for?
8. What denotes a TSD facility?
9. How long can you store hazardous waste before you become a storage facility?
10. Is oil from halogenated solvents considered a hazardous waste?
11. Give the definition of a hazardous waste.
12. Name the four characteristics.
13. When is a manifest necessary?
14. When do you become a generator?
15. 1000 kilograms represents approximately how many drums?
16. How many pounds is 1000 kilograms?

Lesson No. 4

MANIFESTING A HAZARDOUS WASTE

- A. GENERATOR
- B. TRANSPORTER
- C. TSD FACILITY

MANIFESTING A HAZARDOUS WASTE

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 30 minutes

TOPICS DISCUSSED:

Manifesting:

- A. Generator
- B. Transporter
- C. TSD Facility

Subpart B, Sec. 262.20 through 262.23.

Instruction covering:

- A. Newly formulated EPA rules and regulations that went into effect November 19, 1980 (Part 262) and their effect, step-by-step explanation using the State of Wisconsin's hazardous waste manifest as an example.
- B. Copies (filled in examples) of new hazardous waste manifests are given to each one present. Also, a copy of hazardous waste labels that will be required on each drum of hazardous waste offered for transportation as per 49 CFR, Sec. 172.304 and 40 CFR, Sec. 262.32.
- C. Explain that all shipments of hazardous waste in bulk or drums must be accompanied from cradle-to-grave by a State of Wisconsin hazardous waste manifest. Explain in detail as to how it should be filled in, by whom it should be signed, and that all four copies must be legible. Signatures should be full name (not initials) and legible.
- D. Explain that a small generator is one who generates less than 1,000 kilograms (or 2,205 pounds) of hazardous waste a month, which is approximately four drums and does not need an EPA number. A generator can't keep material longer than 90 days on his premises without becoming a storage facility.

1. #1 copy to TSD facility (send copy to DNR).
 2. #2 copy to transporter from TSDF.
 3. #3 copy to generator from TSDF.
 4. #4 copy generator keeps (send copy to DNR).
- F. Who has to fill out manifests? Anyone who transports or offers for transport any amount of hazardous waste.
- G. Manifest is also a shipping document.
- H. The new hazardous waste labels that must be on each drum and dated and filled out are in addition to, and not separate from, the previously existing DOT rules and regulations regarding specified containers and correct labeling. Need to make sure containers have proper gaskets, the bungs are tight and tops are clean and free from waste.
- I. The DOT hazardous waste label should be placed on all waste solvent as Solvent N.O.S.
- J. For safe transportation, drums of hazardous waste should (because of vapor pressure) be filled to only 50 gallons maximum. Within 24 hours before shipping, check for leaks.

(SECTION #1)

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. What is the reason for a manifest?
2. When do you use it?
3. Are manifest different in different states?
4. If there is a conflict between city, county, or state and federal regulations, what rule applies?
5. How many copies are needed?
6. How are they distributed?
7. Is it all right to abbreviate; e.g., M.E.K., I.P.A.?
8. Can you leave some areas of the manifest blank if you don't understand?
9. What are the four characteristics of hazardous waste?
10. Is the manifest acceptable as a shipping document?
11. What is meant by units?
12. Must a transporter always take the hazardous waste to the TSD facility designated on the (paperwork) manifest?
13. What is the UN/NA number?
14. How long can you store hazardous waste without becoming a storage facility?

(SECTION #2)

MANIFESTING

Instructor _____
Date _____

Employee's
name _____
Grade _____

Job
classification _____

Notice to students attending this class:

At the close of the question and answer session, a blank copy of the State of Wisconsin hazardous waste manifest will be given to each student to fill in correctly using the example given and information therein. These manifests will be graded for accuracy and recorded.

Manifest the following example:

20 drums of hazardous waste lacquer thinner.
Component % approximately:

30% - Methyl Ethyl Ketone

20% - Toluene

16% - Paint Sludge

4% - Water

4% - Acetates

14% - Ketones

6% - Aromatics

6% - Esters

For fictitious names use Mary Doe, John Doe, etc.

EMPLOYEE TRAINING PROGRAM

LESSON NO. 5

A. LABELING OF HAZARDOUS
WASTE FOR TRANSPORTATION
AND STORAGE.

B. PLACARDING AND MARKING

Lesson 5

LABELING OF HAZARDOUS MATERIALS

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes

TOPICS DISCUSSED:

40 CFR - Pretransportation requirements, EPA & DOT

Regulation

- 262.30 - Packaging - 49 CFR, Parts 173, 178, 179.
- 262.31 - Labeling - 49 CFR, Sec. 172.400
- 262.32 - Marking - 49 CFR, Sec. 172.300
- 262.33 - Placarding - 49 CFR, Sec. 172.504
- 262.34 - Accumulation Time

Class was instructed in all the above sections, noting that EPA rules are in addition to, and not separate from, DOT's rules and regulations, and that whenever a city, county, or state regulation comes in conflict with Federal regulations, then most stringent rule shall apply.

Instructor _____

Date _____

Employee's
name _____

Grade _____

Job
classification _____

1. What kind of DOT container is needed for shipping 55 gallons of waste methyl ethyl ketone?
2. What kind of a DOT container would you use if shipping 55 gallons of waste acetone?
3. Would you place a hazardous waste label on the top or the side of the drum?
4. Would an empty 55-gallon drum which previously contained hazardous waste need to be manifested?
5. What is EPA's definition of an empty container?
6. Do you need to put the accumulation date on a hazardous waste label?
7. What is the definition of an incompatible substance?
8. Where in 49 CFR would you look to find the proper shipping name?
9. How long must a generator keep a drum of hazardous waste before shipping? Why?
10. Should the generator and transporter section in a manifest be filled out correctly before transporting?
11. Write a proper shipping name for a mixture of hazardous waste e.g., 20% acetone, 40% mineral spirits, 40% kerosene.

EMPLOYEE TRAINING PROGRAM

Lesson No. 6

A. PRECAUTIONS FOR HANDLING HAZARDOUS WASTE ETC.

B. INSPECTION OF HAZARDOUS WASTE STORAGE AND FACILITY AREA.

HANDLING & INSPECTION OF HAZARDOUS WASTE-REQUIREMENTS,
COMPLIANCE, PRECAUTIONS, ETC.

Classroom instruction time 1-1/2 hours
Question and answer session 15 minutes
Testing time 15 minutes

TOPICS DISCUSSED:

Storage of hazardous waste and use and management of Subpart I, 40 CFR, 265.170, 265.171, 265.172, 265.173, 265.174, 265.176, 265.177, 265.190

Class was instructed to make sure before shipping any hazardous waste that the transporter has obeyed all rules and regulations and that the containers, if drums, are properly labeled with accumulation dates and labeled in accordance with DOT regulations, with correct EPA waste (hazardous) label on drum, and that containers were in proper condition using the following steps:

1. Make sure manifest is in order.
2. Make sure labels on drums match the information on the manifest.
3. If there is any discrepancy in count, note on manifest before giving transporter his copy.
4. Before loading, check all drums to see if they are in good condition or leaking. If needed, transfer the ones that don't comply.
5. Stack drums in a safe manner according to category.
6. Make sure aisle ways and exits are kept clear throughout the storage area.
7. Observe all applicable general safety rules for forklifts.

I N S P E C T I O N S E C T I O N

HAZARDOUS WASTE STORAGE INSPECTION

1. One person assigned to daily check on a walk-through of all storage areas (keeping a record of inspection) to see if any containers are leaking or seeping, and to report anything that needs correction.

2. A walk-through once a week through the entire facility by a qualified person to inspect and identify any problem that might lead to: (a) a release of hazardous waste, (b) a threat to human health, (c) a written report will be kept on file covering weekly inspection for the following:

1. Malfunctions
2. Deterioration
3. Operator errors
4. Check containers
 - (a) Improper construction
 - (b) Leaks or corrosion

and noting on checklist inspection of storage tanks, containers, dikes, retaining walls, emergency equipment, alarm systems, safety equipment, fire fighting equipment, security locks, warning signs, leaking valves, etc.

TEST: LESSON NO. 6

Instructor _____

Date _____

Employee's

name _____

Grade _____

Job

classification _____

1. What label is required by EPA on a drum of waste?
2. Where should the label be placed? Why?
3. How often should storage area be checked for leakers?
4. How full should a 55-gallon drum be filled to be safe for transportation?
5. If you notice that a drum of waste is leaking, should you transfer it immediately or wait until you have time?
6. Is it all right to tighten a bung on a drum without a gasket? Are gaskets required?
7. Are the EPA number and the manifest number supposed to be on the hazardous waste label?
8. What about the accumulation date?
9. Why is routine inspection so vital?

Attachment IV
Contingency Plan

095-34

CONTINGENCY PLAN
TABLE OF CONTENTS

SECTION I - PRELIMINARY RESPONSE

INTENT OF PLAN	G I-1
OVERVIEW	G I-1
EQUIPMENT AND ALARMS	G I-2
EMERGENCY RESPONSE	G I-3

SECTION II - EMERGENCY SQUAD

FIRE AND RESCUE SQUAD	G II-1
IMPLEMENTATION OF PLAN	G II-1
EMERGENCY RESPONSE PROCEDURES	G II-3
IDENTIFICATION OF WASTES	G II-4
FIRE OR EXPLOSION	G II-4
SPILLS	G II-7
POST EMERGENCY PROCEDURES	G II-14

PETERSON BUILDERS, INCORPORATED
HAZARDOUS WASTE STORAGE
CONTINGENCY PLAN

I-A. Intent of Plan

The intent of this plan is to provide the employees of Peterson Builders, Inc., with an outline of actions to be taken in the event of a fire or a spill of hazardous wastes.

Familiarity with this plan should help you to take the proper actions in the event of a spill or fire. Safety in handling hazardous wastes, common sense, and the use of proper tools to prevent fires and spills will always be the best plan. Knowledge of this plan and safety will help guard your health and help keep Door County a good place to live.

This plan has two parts. Part I is designed to be used by the people handling hazardous wastes or working at the paint warehouse. Part II is designed as a guide for the Rescue and Emergency Squad.

I-B. Hazardous Waste Operations Overview

This plan applies to the Peterson Builders, Inc., (PBI) paint warehouse located at 107 E. Walnut Street, Sturgeon Bay, WI 54235. PBI builds and repairs ships. Part of that process involves painting. The solvents used to clean paint brushes, paint sprayers and fiberglassing tools become hazardous wastes. PBI requires special care and handling of those wastes to avoid injury or pollution.

There are two special hazards involved. The solvents are flammable. Special care must be taken to avoid any source of ignition. The solvents would poison ground water if released in large quantities. Spills must be prevented.

To avoid the possibility of ground water contamination, PBI tracks the solvents to their final destination. Solvents are collected in specially labelled and numbered barrels. Records are kept on each barrel as it moves from the shipyard to the storage warehouse to the original supplier. The original supplier arranges to have the solvents recycled. PBI has them recycled to avoid creating dumps or polluting the air through burning.

I-C. Firefighting Equipment, Spill Cleanup Equipment and Alarms

1. Firefighting Equipment

- a. A B-II dry chemical fire extinguisher is located near the warehouse door.
- b. Two Mine Safety Respirators with spare cartridges, hard hats and spray shields are in the safety locker.
- c. A portable first aid kit is in the safety locker.

2. Spill Equipment

- a. A 150 foot roll of 3M Sorbent and two 50 pound bags of sorbent are next to the safety locker. Sorbent can be used to dam or soak up spills.
- b. Respirators, spare cartridges, 2 pair of rubber gloves and boots, hard hats, spray shields and disposable coveralls are in the safety locker.
- c. Over size drums (at least three) are next to the safety locker. Over size drums can be placed around leaking drums.
- d. Two five gallon/minute hand pumps are next to the safety locker. Hand pumps can be used for emptying drums or pumping out contained spills.

- e. For large contained spills, 35 gpm Jabsco pumps are available at the paint shop and maintenance shop. Jabsco pumps take suction through a normal garden hose. Impellers are rubber and explosion proof. Mount the pump motor outside of the area and lead hoses from the spill and to the recovery drum.

3. Alarms

- a. A telephone is mounted above the supervisor's desk. Dial 333 to report an emergency.
- b. A warehouse alarm is located above the supervisor's desk. It is activated by a light switch.

I-D. Emergency Response

In case of a spill or fire, the first action taken must be to notify the PBI Fire and Rescue Squad. If you are alone, don't try to fight the fire, GET HELP.

There is a telephone located on the warehouse supervisor's desk. To get help, dial 333. The operator will notify the Fire and Rescue Squad and the Sturgeon Bay Fire Department. The Fire and Rescue Squad has people specially trained in fighting fires and spills.

Your next action should be to sound the warehouse fire and evacuation alarm. The alarm is sounded by flipping a switch. The switch is mounted above the right-hand side of the supervisor's desk.

Once the proper notifications have been made, the Fire and Rescue Squad will take full charge of the situation. Persons who are not on the Fire and Rescue Squad should take actions as directed by the Squad leader.

SECTION II - EMERGENCY SQUAD

II-A. Fire and Rescue Squad

Upon receiving a call on 333, the operator will sound the shipyard emergency alarm, announce the emergency location, and call the Sturgeon Bay Fire Department and Emergency Medical Team.

The following people have special emergency training, and are called in case of a spill or fire. The Fire and Rescue Squad will call these people.

Primary	Orville Gauger 463 N. 7th Ave. Sturgeon Bay, WI 54235 Home Phone: (414) 743-2794 Work Phone: (414) 743-5577
Alternate	Fred J. Peterson-II 4060 N. Bay Shore Dr. Sturgeon Bay, WI 54236 Home Phone: (414) 743-3261 Work Phone: (414) 743-5577
Alternate	Bruce Atkins 1113 N. 8th Ave. Sturgeon Bay, WI 54235 Home Phone: (414) 743-9294 Work Phone: (414) 743-5577

All of the above-named people normally respond to the shipyard alarm as part of the Fire and Rescue Squad.

II-B. Implementation of Contingency Plan

Once contacted, the head of the Fire and Rescue squad will take full charge of the situation. He

shall decide whether, and to what extent, to implement the remainder of this contingency plan.

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the emergency coordinator in making this decision by providing decision making criteria.

The contingency plan will be implemented in the following situations:

1. Fire and/or explosion
 - A. A fire causing the release of toxic fumes.
 - B. The fire spreads and could possibly ignite materials at other locations on site or could cause heat induced explosions.
 - C. The fire could possibly spread to off site areas.
 - D. Use of water or water and chemical fire suppressant could result in contaminated runoff.
 - E. An imminent danger exists that an explosion could occur causing a safety hazard because of flying fragments or shock waves.
 - F. An imminent danger exists that an explosion could ignite other hazardous waste at the facility.

G. An imminent danger exists that an explosion could result in release of toxic material.

H. An explosion has occurred.

2. Spills or Material Release

A. The spill could result in release of flammable liquids or vapors thus causing a fire or gas explosion hazard.

B. The spill could cause the release of toxic liquids or fumes.

C. The spill can be contained on site, but the potential exists for ground water contamination.

D. The spill cannot be contained on site, resulting in an off site soil contamination and/or ground or surface water pollution.

II-C. Emergency Response Procedures

1. Notification

In the event of an emergency situation, the Fire and Rescue Squad and Fire Department will be notified first; subsequently all facility personnel, appropriate federal, state or local agencies and police departments will also be notified.

Emergency Response Agency Contacts

Sturgeon Bay Fire Department	743-2121
Sturgeon Bay Police Department	743-2244
Sturgeon Bay Emergency Medical Team	743-2244
Wisconsin DNR Emergency number	608-266-3232
National Emergency Response Center	800-424-8802
U.S. Coast Guard MSO, Milwaukee (if any spill could pollute water)	291-3135
Checmm Trec	800-424-9300

II-D. Identification of Hazardous Wastes

The head of the Fire and Rescue Squad will immediately identify the character, exact source, amount and area extent of the release. The initial identification method will be to utilize visual analysis of the material and location of the release. If for some reason the released material cannot be identified, samples will be taken for chemical analysis if possible.

II-E. Assessment

The emergency coordinator will assess possible hazards both direct and indirect to human health or the environment.

II-F. Control Procedures

Potential emergencies fall under two general classifications.

1. Fire and/or explosion.
2. Spills or material releases

Natural disasters such as earthquakes or tornados are assumed to fall into these two classifications.

II-G. Fire and/or Explosion

The hazardous waste building can be easily accessed by fire fighting and other emergency vehicles and equipment.

The Fire and Rescue Squad will be on standby during all general plant emergencies. During times of power failure or severe weather, fire protection personnel

will be assigned to protect personnel and property. If a fire should break out, concentration will be placed on preventing the fire from spreading to nearby areas. The fire fighting effort will be carried out by the fire brigade until outside assistance has arrived.

The following actions will be taken in the areas affected by the fire or explosion.

1. Fire doors in buildings will be closed.
2. Work in all hazardous areas will be shut down immediately.
3. The area will be cleared of all personnel not actively involved in fighting the fire. These persons are to report to the designated rally points for accountability. (See evacuation plan).
4. All injured persons will be removed and medical treatment will be administered by qualified personnel.

Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition have been eliminated. The vehicular traffic and hazardous work in the area will cease until the spill is contained and safety is restored. If spilled materials are flammable, the Fire and Rescue Squad will respond with foam equipment and hoses. Flushing with large quantities of water or foaming of the spill will be performed only if advised by the head of the Fire and Rescue Squad.

If substantial quantities of a highly flammable material is released (e.g. propane or natural gas), all persons within at least a quarter mile radius of the release will be notified. All ignition sources within this area will be eliminated. Use of motor vehicles within this area will be restricted or eliminated to avoid ignition of vapors which can cause a flashback to the source and initial explosion of fire of wide dimensions. If the chance of an impending explosion are high, all potentially affected areas, whether on or off PBI property will be evacuated.

Fire fighting will not be done at the risk of injury to the persons involved; however, early containment of fires can significantly decrease total damage.

Until evacuation is signaled, personnel who are not in an effected area will stay in their respective work areas. Contract personnel and visitors will be cleared from the area and instructed to report to the rally point.

The head of the Fire and Rescue Squad will be responsible for all fire fighting efforts until outside help arrives. Supervisors of unaffected areas will stay with their personnel and be ready to evacuate and account for the persons under their supervision. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is longer endangered. The head of the Fire and Rescue Squad will determine when

the emergency has passed. All emergency equipment used in the emergency must be cleaned and fit for use prior to resumption of plant operation in the affected areas.

II-H. Spills and Material Releases

In the event of a major emergency involving a chemical spill the following general procedures will be used for rapid and safe response and control of the situation.

If an employee discovers a chemical spill or process upset resulting in vapor release, he or she will immediately report it to the area supervisor.

The area supervisor will contact the Fire and Rescue Squad. When contacted, the Fire and Rescue Squad will obtain information pertaining to the following:

1. The material spilled or released.
2. Location of the release or spillage of hazardous material.
3. An estimate of quantity released and the rate at which it is being released.
4. The direction in which the spill or vapor or smoke release is heading.
5. Any injuries involved.
6. Fire and/or explosion or possibility of these events.
7. The area and materials involved and the intensity of the fire or explosion.

This information will help the Fire and Rescue Squad and Fire Department to assess the magnitude and potential seriousness of the spill or release. If the incident is determined to lie within on scene emergency response capabilities, the head of the Fire and Rescue Squad will contact and deploy the necessary plant personnel. If additional help is needed, the Sturgeon Bay Fire Department is capable of summoning that help.

The initial response to any emergency will be to protect human health and safety and then the environment. Identification, containment, treatment, and/or disposal assessment will be the secondary response.

If for some reason a chemical spill is not contained within a containment structure, i.e. dike, an area of isolation will be established around the spill. The size of the spill and the material involved. Small spills or leaks will require evacuation of the immediate buildings to allow cleanup and repair to prevent exposure. When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated area. The buildings roped off or otherwise blocked off until cleanup is completed.

If the spill results in the formation of a toxic vapor cloud, (by reaction with surrounding materials or by breakout of fire) (due to high vapor pressures

under ambient conditions), further evacuation will be enforced. Areas should be evacuated downwind if volatile materials are spilled.

THE NATIONAL RESPONSE CENTER, PHONE NO. 1-800-424-8802, WILL BE NOTIFIED ANY TIME A SPILL GOES BEYOND PBI PROPERTY, GOES INTO A SEWER, OR LEAVES THE CONCRETE AREA; OR IN THE EVENT OF A FIRE.

As called for in regulations developed under the Comprehensive Environmental Liability and Compensation Act of 1980 (Superfund), PBI's practice is to report a spill of a pound or more of any hazardous material for which a reportable quantity has not been established and which is listed under the solid waste disposal act, clean air act, clean water act, or toxic substances control act. Peterson will also follow the same practice for any substance not listed in the acts noted above, but which can be classified as hazardous waste under RCRA.

If the Fire and Rescue Squad determines that the Company is unable to handle the emergency, then local, state and federal authorities will be notified of the situation. Evacuation of all potentially affected areas will be initiated as soon as possible.

The following guidelines will be used in case of an accidental episode involving waste materials. These are general guidelines and circumstances may dictate some alterations to these procedures.

Most spills and leaks are easily contained within a small area. Small spills can be absorbed with an absorbant media such as oil dry, scooped up and then placed in 55 gallon drums. For all large spills and serious leaks, the following guidelines will be followed as closely as possible.

1. If a leak developes or a spill occurs from the waste storage area, tank, or pipe line, etc., the person discovering the discharge will leave the immediate area and contact either their supervisor of the Fire and Rescue Squad. The person contacted will obtain the following information.
 - A. Person(s) injured and seriousness of injury.
 - B. Location, of the spill or leak, material involved and source, drums, tank, pipe line, etc.
 - C. The approximate amount spilled, and estimate of the liquid flow or gaseous cloud movement.
 - D. Wether or not a fire is involved.
2. Next, the emergency coordinator will:
 - A. Initiate evacuation of the hazard area. For small spills or leaks, isolate the affected area.

- B. Obtain medical attention for any injured persons. It may be helpful to instruct the caller in initial first aid procedures, then call the hospital.
 - C. Call the fire department if a fire is involved that cannot be extinguished by plant personnel. Fight small fires with dry chemicals, CO₂ or foam and large fires with water spray, fog, or foam. Keep heat exposed containers cooled with water spray and remove them from the fire. IF A RISING SOUND COMES FROM A VENTING DEVICE OR THE DRUM BEGINS TO DISCOLOR WITHDRAW FROM THE AREA IMMEDIATELY.
 - D. Dispatch emergency personnel to the site to take the appropriate action.
 - E. Contact the proper authorities if the spill or release is large. Contact local authorities first so that, if necessary, downstream water users and/or persons downwind of the vapor can be notified, and if necessary, evacuated.
3. Cleanup personnel will:
- A. Make sure all unnecessary persons are removed from the hazard area.

- B. Put on protective clothing and equipment.
- C. If the flammable waste is involved, remove all ignition sources and use spark and explosion proof equipment and clothing in containment and cleanup.
- D. If possible, try to stop the leak. Over pack drums may be used for this purpose.
- E. Remove all surrounding materials that could be especially reactive with materials in the waste. Determine the major components in the waste at the time of spill.
- F. Use absorbant pads, booms, earth, sandbags, sand and other inert materials to contain, divert, and cleanup a spill if it has not been contained by a dike. Spills contained within the dike can be pumped back into an appropriate barrel.
- G. If wastes reach a storm sewer, try to dam the outfall by using sandbags, earth, or other material. If this is done, wastes in the storm sewers should be pumped out into a temporary holding tank or drums as soon as possible. If a spill enters the surface water, use absorbant brooms and sweep around the outfall to contain and absorb water insoluble organics.

- H. Place all containment and cleanup materials in drums for proper disposal. Some items such as absorbant rags or brooms may have to be cut up.
- I. Place all recovered liquid waste and contaminated soil in drums. The drums should be transported to the Storage Building at 107 E. Walnut or the Paint Cleanup Building at 101 Pennsylvania. Material Handling Dept. will arrange for proper disposal or incineration.
- J. Decontaminate all reusable spill containment material, tools and equipment, i.e. protective suits, shovels, pails, etc.

Prevention of recurrence or spread of fires, explosions or releases

Actions to prevent the recurrence of spread of fires, explosions, or releases include stopping processes and operations, collecting and containing released waste, and recovering or isolating containers.'

Storage and treatment of released material

Immediately after an emergency, the paint foreman will make arrangements to have all cleanup and waste barrels moved to the West Side waste storage building.

Incompatible wastes

The Fire and Rescue Squad will have any materials that are incompatible with the spilled wastes removed to s a safe location until cleanup is completed.

Post emergency equipment maintenance

After an emergency event, all emergency equipment will be cleaned so that it is fit for use or it will be replaced. Before operations are resumed, an inspection of all safety equipment will be conducted.

Familiarization and Agreements

Familiarization of local agencies with the nature and hazards of this facility shall be effected through distribution of the contingency plan. No special arrangements have been made.

Distribution of Plan

Copies of the contingency plan have been given to the local police and fire departments, the hospital, and state and local response teams. These agencies were asked to review and comment on the plan. The following organizations have been sent copies of the contingency plan:

- Sturgeon Bay Fire Department
- Sturgeon Bay Police Department
- Local Hospital
- Local emergency medical team
- DNR District Headquarters
- DNR hazardous waste management section chief, Madison
- USCG Marine Safety Office, Sturgeon Bay
- U.S. EPA Region V, Chicago, IL

Evacuation Plan

Due to the small size of the facility and the few persons at the facility at any one time, the evacuation plan will be limited to the evacuation of the physically attached buildings. In case of fire or explosion, the response team shall coordinate evacuation. Each building is equipped with sufficient exits

to facilitate orderly evacuation. Further evacuations shall be ordered at the sole discretion of the Fire and Rescue Squad leader.

II-I. Required Reports

As required by state and federal law, any emergency event (e.g. fire, explosion, etc.) that requires implementing the contingency plan will be reported in writing within 15 days to the EPA Regional Administrator. The reporting form for emergency events is shown in Figure 1.

II-J. Amendments to the contingency plan

The contingency plan will be reviewed and immediately amended if necessary whenever

1. The plan fails in an emergency.
2. The facility changes its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosion or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary to an emergency.
3. The list of emergency coordinator changes.
4. The list of emergency equipment changes.

Attachment V

Closure Plan

095-38

SECTION I

CLOSURE PLAN AND
FINANCIAL REQUIREMENTS

SECTION I

CLOSURE PLAN & FINANCIAL REQUIREMENTS

I. Facility Conditions

A. General Information

1. The waste flammable liquid holding area is 24' X 42' metal building located as shown on the enclosed layout. Both loading and unloading area and the floor are of impervious cement.
2. All ignitable (hazardous) wastes are put in 55 gallon drums at either Plant #1 or Plant #2 and shipped to this area for accumulation prior to shipping to a recycling facility. These drums are stored directly on the concrete floor or pallets.
3. The principle type of waste stored is waste non-halogenated solvents which are used to clean painting equipment. Typical solvents used are toluene, butyl acetate and cellosolve acetate.

B. Maximum amount of waste inventory is ~~two hundred~~ *fifty* 55-gallon drums (~~11,000~~ *2750* gallons).

C. Equipment Inventory

1. One fork lift
2. Miscellaneous hand tools
3. Miscellaneous safety equipment
4. Miscellaneous spill recovery equipment

D. Closure Schedule

1. Removal of Inventory - During the first 30 days of closure, all inventory will be removed and disposed of.
2. Decontamination - During the second 30 day period of closure, the facility will be decontaminated as described below and all residues will be removed and disposed of.

II. Removal of Inventory

All waste solvent will be disposed of by recycling. Sheboygan Paint Company, Sheboygan, Wisconsin is currently transporting all such waste to their facility for recycling, free of charge, and there is no pretreatment which is required before Sheboygan Paint Company will accept waste solvent for shipment. No treatment or disposal will occur

at Peterson Builders' facility. Prior to loading all drums are inspected for leakage, damage and proper labeling. Proper manifest forms are completed.

III. Facility Decontamination

A. Structures

The floor and the loading dock are the only structures that will possibly need any decontamination. This surface will first be scrapped free of any residue and then steam cleaned and rinsed with water. All residue will be placed in a 55-gallon drum using hand tools. All excess water will be collected by a wet vacuum and placed in the same drum.

B. Equipment

All equipment used in decontaminating structures in the daily operation of the facility will be steam cleaned and rinsed with water. The rinse water will be collected as above and placed in a 55-gallon drum.

C. The amount of waste generated by the decontamination process will not exceed two 55-gallon drums, which will be disposed of in the same manner as discussed for inventory.

The facility superintendent will monitor all activities to ensure conformance with this plan.

IV. Financial Responsibility

See Appendix C.

V. Post Closure

A. Due to the nature of this facility, post-closure requirements including post-closure bonds are not applicable.

VI. Estimated Closure Date

No closure date is anticipated. For planning purposes closure date may be set as December 31, 2083.

Attachment VI
Closure Cost Estimate

095-38

CLOSURE COST ESTIMATE

I.	Drum disposal:	52 drums @ \$20.00	\$1,040.00
II.	Waste incineration:	2750 gal. @ \$0.30 \$0.30	825.00
III.	Scrub floor and clean equipment:		
	3 Laborers @ 3 hrs./each		72.00
	1 Supervisor for 3 hrs.		45.00
IV.	Load scrub water in barrels:		
	3 Laborers @ 1 hr.		24.00
	1 Supervisor for 1 hr.		15.00
V.	Load barrels on truck:		
	1 Forklift Operator for 5 hrs.		60.00
VI.	Final Inspection and Manifests:		
	3 hours salaried Supervisor		75.00
VII.	Transportation; assumes 12 hour round trip, 15 miles/gallon, 3 trips, \$1.10/gallon of gas:		
	Gas		120.00
	Driver		360.00
			<hr/>
		Sub-total	\$2,221.50
		15% Contingency	328.23
		TOTAL	<hr/> \$2,549.73

Attachment VII
Containment System

095-38

D-1a(2) Container management practices

Prior to transfer to the container storage building, wastes generated in the process areas are placed in the proper drums, sealed, and labeled according to Department of Transportation regulations for hazardous materials. Transfer of drums to the container storage area is performed by truck as outlined in the facility traffic discussion in Section B. A drum handler is used to load and unload containers onto the truck for transport to the facility and off of the truck once it reaches the storage building. At the storage building there are no sources of ignition such as open flames.

Primary aisle space of at least 3 feet is maintained at all times and the container storage area is inspected regularly (See Section F-2).

D-1a(3) Secondary containment system design and operation

The container storage area pad is constructed of concrete, designed for loads of 250 lb/in square. A 6 inch high concrete curb lines the perimeter of the storage area to provide a holding capacity of 3366 gallons, or more than ~~31%~~ 100% of the total volume held by the estimated maximum inventory, and sixty-one times the volume of the largest container.

Containment volume calculation. 1000 sq. ft. - 100 sq.
ft. (ramp areas)

= 900 sq. ft.

900 sq. ft. x .5 ft. (curb height)

= 450 cubic ft.

1 cubic ft. = 7.48 gal.

450 cubic ft. x 7.48 gal/cubic ft.

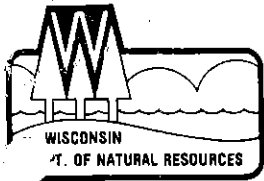
= 3366 gal.

The concrete pad is presently in good condition, free of any gaps, holes, or cracks.

The pad will be regularly inspected as discussed in Section F-2 to insure that it remains impervious and in good condition. Because the facility is located indoors, rainwater collection sumps are not necessary.

Run-on is prevented from entering the containment area by several means. Besides the presence of a 6 inch curb at the perimeter of the storage area in the building, the walls of the building also prevent run-on to the area.

The doors on the storage building are lockable and 24 hour surveillance is provided at the facility.



STATE OF WISCONSIN DEPT. OF NATURAL RESOURCES

HAZARDOUS WASTE FACILITY OPERATION LICENSE

AUTHORIZED CONTACT

Mr. Don Johnston
Environmental Coordinator
Peterson Builders, Inc.
101 Pennsylvania St., P.O. Box 650
Sturgeon Bay, WI 54235-0650

LICENSE NO: 03155

TYPE OF FACILITY: Small Storage

EFFECTIVE DATE: September 30, 1988

DATE OF EXPIRATION: September 30, 1989

U.S. EPA I.D. NUMBER: WID096828975

Container Storage (S01)

Storage Capacity - 5500 gallons
(100 - 55 gallon drums)

LICENSEE: Peterson Builders, Inc.

NAME OF FACILITY: Peterson Builders, Inc.

LOCATION OF FACILITY: Peterson Builders, Inc.
107 Walnut Street
Sturgeon Bay, WI

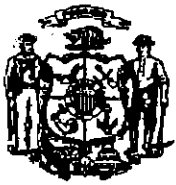
This facility is located within
the corporate limits of the City
of Sturgeon Bay in Section 18,
T27N, R26E, Door County, WI

This license is subject to and conditioned upon compliance with the licensee's
Federal RCRA hazardous waste operating permit issued on August 6, 1984, and modified
on September 30, 1986 under 42 USC 6925 (c).

THIS LICENSE AUTHORIZES THE LICENSEE TO OPERATE THE HAZARDOUS
WASTE FACILITY DESCRIBED ABOVE DURING THE TERM HEREOF EXCEPT
AS MODIFIED BY THE DEPARTMENT. THIS LICENSE IS SUBJECT TO AND
CONDITIONED UPON COMPLIANCE WITH CHAPTER 144, WIS. STATS., AND
CHAPTER NR 181, WIS. ADM. CODE (HAZARDOUS WASTE), ANY PLAN
APPROVAL AND MODIFICATIONS THEREOF, AND ANY SPECIAL ORDER
AND MODIFICATIONS THEREOF ISSUED BY THE DEPARTMENT. ANY
EXEMPTIONS FROM THE REQUIREMENTS OF CHAPTER NR 181, WIS. ADM.
CODE, ISSUED FOR THIS FACILITY ARE LISTED ABOVE AND ON ATTACHED
DOCUMENTS.

Carroll D. Besadny

CARROLL D. BESADNY, SECRETARY
DEPARTMENT OF NATURAL RESOURCES



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

Box 7921
Madison, Wisconsin 53707

RECEIVED
SEP 30 1988

IN REPLY REFER TO: 4430

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Don Johnston, Environmental Coordinator
Peterson Building, Inc.
101 Pennsylvania Street
Sturgeon Bay, WI 54235-0650

SUBJECT: Hazardous Waste Operating License
Peterson Builders, Inc. (Walnut Street)
EPA ID No.: WID096828975
DNR License No.: 03155

Dear Mr. Johnston:

Enclosed is the operating license for the hazardous waste small storage facility at Peterson Builders, Inc., located at 107 Walnut Street, City of Sturgeon Bay, in Door County, Wisconsin. Hazardous waste management licenses are issued under the provisions of ch. NR 181, Wis. Adm. Code. Peterson Builders, Inc. is now authorized to store hazardous waste at this location.

All information printed on the license should be checked for accuracy. Please notify your local DNR district office of any errors or changes to this information. The Department must also be promptly informed of any changes in ownership or any changes to the basic operation of the facility.

Please note that this license is effective until September 30, 1989 and must be renewed prior to the end of that period. Applications for renewal are due by June 1, 1989. This license can continue to be renewed for two-year periods until the end of the license duration period. The license duration period is a fixed term not to exceed 10 years from the date of the initial operating license issuance. In order to continue to store waste after this 10 year period, you must submit all the necessary reports for an initial operating license. These reports should be submitted at least 180 days before the end of your license duration period. As you are receiving your license through the feasibility and plan of operation report exemption found in s. NR 181.435(2), Wis. Adm. Code, the license duration period for your small storage facility ends on August 6, 1994, the expiration date of your federal RCRA permit.

Mr. Don Johnston, Environmental Coordinator

2.

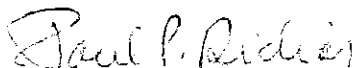
The Department is also informing you that Peterson Builders is required, per s. NR 181.115, Wis. Adm. Code, to have its laboratory certified under ch. NR 149, Wis. Adm. Code, for all tests listed in your waste analysis plan.

Wisconsin law requires the Department to provide the following notification of appeals rights whenever an initial license is issued:

Any person aggrieved by this decision, which adversely affects the substantial interests of such person, is entitled to judicial review by filing a petition in accordance with the provisions of ss. 227.52 and 227.53, Statutes. The petition for judicial review must be filed and served within thirty (30) days after the license was mailed and must name the Department of Natural Resources as the respondent. This notice is provided pursuant to s. 227.48(2), Statutes.

If you have any questions regarding your new license, please contact Nichol Mamolou, Lake Michigan District Hazardous Waste Specialist at (414) 497-3107.

Sincerely,



Paul P. Didier, P.E., Director
Bureau of Solid & Hazardous Waste Management

PPD:EL:so32
8810\SW9PETLI.SXB

Enc.

cc: Barb Zellmer - SW/3
Doug Rossberg - LMD
Nichol Mamolou - LMD
Chuck Slaustas - 5HR/13, EPA - Reg. V
Trish Polston - 5HR/13, EPA - Reg. V
Hazardous Waste Management Section - SW/3
Program Services Section - SW/3
Bureau of Information Management - IM/3